

June 24, 2019

BY ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: *Space Exploration Holdings, LLC, IBFS File Nos. SAT-LOA-20161115-00118 and SAT-MOD-20181108-00083; WorldVu Satellites Limited, IBFS File No. SAT-LOI-20160428-00041; and Kepler Communications Inc., File No. SAT-PDR-20161115-00114*

Dear Ms. Dortch,

On June 20, 2019, Telesat Canada (“Telesat”) filed an *ex parte* letter disclosing a telephone conversation between its counsel and a member of the Commission’s International Bureau.¹ That conversation involved legal arguments submitted by Space Exploration Holdings, LLC (“SpaceX”) with respect to the proper application of Section 25.261 of the Commission’s rules and the conditions precedent for a non-geostationary satellite system to claim “home base” spectrum thereunder. Despite the complexity of that subject, the only description supplied by Telesat of its conversation with the staff is that Telesat “believe[s] SpaceX misread the Commission’s rules.”²

That description does not provide sufficient information for the public to understand and respond, if necessary, contrary to the requirements for *ex parte* filings under the Commission’s rules. Specifically, Section 1.1206(b)(1) specifies that an *ex parte* for an oral presentation “must contain a summary of the substance of the *ex parte* presentation and not merely a listing of the subjects discussed. More than a one or two sentence description of the views and arguments presented is generally required.” Accordingly, SpaceX requests that the Commission, pursuant to Section 1.1206(b)(2)(vi), request that Telesat file another *ex parte* to include a more complete discussion of the bases for its contention that “SpaceX misread the Commission’s rules.”

Respectfully submitted,



William M. Wiltshire
Counsel for SpaceX

¹ See Letter from Joseph A. Godles to Marlene H. Dortch, IBFS File Nos. SAT-LOA-20161115-00118, et al. (June 20, 2019).

² *Id.* at 1.