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June 27, 2019

**FILED ELECTRONICALLY VIA IBFS**

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

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

Dear Ms. Dortch:

On June 20, 2019, the undersigned counsel to Telesat Canada (“Telesat”) filed an *ex parte* letter recounting a phone conversation with Karl Kensinger of the FCC’s International Bureau.<sup>1</sup> As stated in the letter, they had informed Mr. Kensinger they believe Space Exploration Holdings, LLC (“SpaceX”) has misread the Commission’s rules concerning which satellite operator is entitled to first choice of “home base” Ku-band frequencies. In response, on June 24, 2019, counsel for SpaceX suggested the

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<sup>1</sup> Notice of *Ex Parte* Communication, Letter dated June 20, 2019 from Joseph A. Godles, Attorney for Telesat Canada, to Marlene H. Dortch, Secretary, Federal Communications Commission, re Space Exploration Holdings, LLC, File Nos. SAT-LOA-20161115-00118 and SAT-MOD-20181108-00083, WorldVu Satellites Limited, File No. SAT-LOI-20160428-00041, and Kepler Communications Inc., File No. SAT-PDR-20161115-00114.

Commission ask Telesat “to include a more complete discussion of the bases for its contention that SpaceX misread the Commission’s rules.”<sup>2</sup>

There is nothing to add for now; Telesat had only a brief, preliminary conversation with Mr. Kensinger. Telesat will, however, be making an additional filing in which it will explain the reasoning behind Telesat’s position. SpaceX will have a full opportunity to respond at that time.

Please direct any questions regarding this matter to the undersigned.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "H. Goldberg", written over a horizontal line.

Henry Goldberg  
Joseph A. Godles  
*Attorneys for Telesat Canada*

cc: Karl Kensinger, FCC  
William M. Wiltshire, counsel for SpaceX

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<sup>2</sup> Letter dated June 24, 2019 from William M. Wiltshire, Counsel for SpaceX to Marlene H. Dortch, Secretary, Federal Communications Commission, re Space Exploration Holdings, LLC, File Nos. SAT-LOA-20161115-00118 and SAT-MOD-20181108-00083, WorldVu Satellites Limited, File No. SAT-LOI-20160428-00041, and Kepler Communications Inc., File No. SAT-PDR-20161115-00114.