

REQUEST FOR EXTENSION OF SPECIAL TEMPORARY AUTHORITY

On January 16, 2020, the Commission granted Space Exploration Holdings, LLC's ("SpaceX") request for Special Temporary Authority ("STA") for operation of its non-geostationary orbit ("NGSO") satellites for sixty days.¹ SpaceX respectfully requests that the Commission extend that STA to cover satellites launched over an additional 30 days for the reasons discussed below.

The current STA authorizes SpaceX (1) to perform telemetry, tracking, and control ("TT&C") functions necessary for orbit-raising of satellites launched during the period the STA was in force; and (2) to test the communications payload on each of those satellites using the 10.7-12.7 GHz, 17.8-18.6 GHz, 18.8-19.3 GHz, and 19.7-20.2 GHz (space-to-Earth) and 14.0-14.5 GHz, 27.5-29.1 GHz, and 29.5-30.0 GHz (Earth-to-space) frequency bands. Pursuant to the STA, SpaceX has been communicating with earth stations operated by its sister company, SpaceX Services, Inc. ("SpaceX Services") during the orbit-raising phase and early operations of its satellites. Applications for all of those earth stations are currently pending.² SpaceX has operated with these earth stations pursuant to STA for up to two months, and has received no complaints from any other authorized spectrum user.

Allowing continued communications between the SpaceX space stations and SpaceX Services earth stations would serve the public interest. The STA covers TT&C functions that are essential to commanding the spacecraft and ensuring the health and safety of SpaceX's nascent constellation. The STA also allows SpaceX to confirm the operational status of its satellites. Extending the STA would allow SpaceX to continue to provide TT&C functions that are essential to commanding all of these spacecraft and ensuring continuing monitoring of and control over SpaceX's nascent constellation, as well as maintaining communications with these craft to assess their functionality. Accordingly, extension of the STA will continue serve the public interest by enhancing space safety and promoting the health and safety of SpaceX's NGSO constellation.

SpaceX will continue to operate on a non-interference basis. Consistent with its authorization, SpaceX will observe the applicable equivalent power flux-density ("EPFD") limits set forth in Article 22 and Resolution 76 of the ITU Radio Regulations and the applicable power flux-density ("PFD") limits set forth in the Commission's rules and Article 21 of the ITU Radio Regulations, which the Commission has found sufficient to protect GSO systems and terrestrial systems, respectively, against harmful interference. Nonetheless, in the extremely unlikely event that harmful interference should occur due to transmissions to or from its spacecraft, SpaceX will take all reasonable steps to eliminate the interference. Should an issue arise, SpaceX can be

¹ See Stamp Grant, IBFS File No. SAT-STA-20191230-00155 (granted Jan. 16, 2020).

² SpaceX Services currently has applications pending for six Ku-band gateway earth stations (located in North Bend, WA; Conrad, MT; Merrillan, WI; Greenville, PA; Redmond, WA; and Hawthorne, CA); one Ku-band TT&C earth station (located in Brewster, WA); and five Ka-band gateway earth stations (located in Conrad, MT; Loring, ME; Redmond, WA; Greenville, PA; and Merrillan, WI). See, e.g., Public Notice, Rep. No. SES-02157 (rel. May 1, 2019); Public Notice, Rep. No. SES-02203 (rel. Sep. 25, 2019).

reached at satellite-operators-pager@spacex.com, which links to the pagers of appropriate technical personnel 24/7.

Accordingly, SpaceX requests that the Commission extend the STA to cover SpaceX space stations launched over an additional 30 days.