

## REQUEST FOR EXTENSION OF SPECIAL TEMPORARY AUTHORITY

Space Exploration Holdings, LLC (“SpaceX”), pursuant to Section 25.120 of the Commission’s rules, hereby requests further extension of its existing Special Temporary Authority (“STA”) for an additional 180 days so that satellites launched and to be launched into its non-geostationary orbit (“NGSO”) Starlink constellation can continue to communicate with earth stations operated by its sister company, SpaceX Services, Inc. (“SpaceX Services”) during the orbit-raising and de-orbit phases and early operations of its satellites. SpaceX has been authorized to launch and operate a constellation of 4,409 NGSO satellites (call sign S2983/S3018) using Ku- and Ka-band spectrum, and to date has launched over 900 spacecraft. Pursuant to a series of STAs, these spacecraft have been communicating with earth stations operated by SpaceX Services for over a year, and SpaceX has received no complaints from any other authorized spectrum user. SpaceX anticipates a regular cadence of further launches throughout 2021, which will require additional authorization for communications with these earth stations.

SpaceX’s last STA expired on or about July 4, 2020.<sup>1</sup> However, SpaceX filed a timely extension request that is still pending.<sup>2</sup> That pending request would extend through approximately December 31, 2020. Accordingly, in an abundance of caution, SpaceX hereby requests a further 180-day extension of the STA beyond the ultimate end date of the prior extension, under the same terms and conditions as that extension.

The Commission has good cause to grant the requested extension. As with the STAs granted over the last year, granting this further extension request would enhance the safety of space by authorizing TT&C functions that are essential to commanding the spacecraft and ensuring the health and safety of SpaceX’s nascent constellation, while also allowing SpaceX to confirm the operational status of its satellites immediately upon insertion. By continuing testing even after the satellites have reached their intended orbits, SpaceX will ensure ongoing capabilities and be better able to prepare for accelerated launch of service. Accordingly, extending the STA will serve the public interest.

As with its most recent STA, SpaceX will continue to operate on a non-interference basis. 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 reached at [satellite-operators-pager@spacex.com](mailto: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 for its Starlink space stations for an additional 180 days.

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<sup>1</sup> See Stamp Grant, IBFS File No. SAT-STA-20191230-00156 (Mar. 19, 2020).

<sup>2</sup> See Request for Extension of Special Temporary Authority, IBFS File No. SAT-STA-20200610-00071 (filed June 10, 2020).