

March 9, 2021

**BY ELECTRONIC FILING**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
45 L Street, N.E.  
Washington, DC 20554

Re: *IBFS File No. SAT-STA-20201218-00147*

Dear Ms. Dortch:

In this proceeding, Space Exploration Holdings, LLC (“SpaceX”) seeks a 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., during the orbit-raising and de-orbit phases and early operations of its satellites. As with its previous extension request,<sup>1</sup> only one party—Viasat, Inc. (“Viasat”)—filed in response, asking once again that the Commission deny or defer consideration of SpaceX’s request.<sup>2</sup>

SpaceX has previously addressed Viasat’s arguments. Rather than restate the errors in Viasat’s submission, SpaceX hereby incorporates its prior responses as if fully set forth herein.<sup>3</sup> For the reasons set forth therein, the Commission should reject Viasat’s opposition and grant the requested STA extension.

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<sup>1</sup> See Request for Extension of Special Temporary Authority, IBFS File No. SAT-STA-20200610-00071 (June 10, 2020).

<sup>2</sup> See Letter from Amy R. Mehlman to Marlene H. Dortch, IBFS File Nos. SAT-STA-20200610-00071 and SAT-STA-20201218-00147 (Feb. 22, 2021).

<sup>3</sup> See Response of Space Exploration Holdings, LLC, IBFS File No. SAT-STA-20200610-00071 (Aug. 17, 2020); Letter from David Goldman to Marlene H. Dortch, IBFS File No. SAT-MOD-20200417-00037 (Feb. 22, 2021).

Marlene H. Dortch

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Sincerely,

*/s/ David Goldman*

David Goldman

Director of Satellite Policy

SPACE EXPLORATION TECHNOLOGIES CORP.

1155 F Street, NW

Suite 475

Washington, DC 20004

Tel: 202-649-2691

Email: [David.Goldman@spacex.com](mailto:David.Goldman@spacex.com)

cc: Amy R. Mehlman