

REQUEST FOR SPECIAL TEMPORARY AUTHORITY TO CONDUCT DIRECT-TO-CELL DEMONSTRATION

Space Exploration Holdings, LLC (“SpaceX”), hereby requests Special Temporary Authority, for an additional period of 30 days,¹ to provide a demonstration of its supplemental coverage from space (SCS) system in Guam with its terrestrial SCS partner Private Tech, Inc. DBA Cape (“Cape”).

SpaceX seeks to connect its direct-to-cellular antennas to cellular test devices using the 1965-1970 MHz and 1885-1890 MHz bands with its supplemental coverage from space (SCS) partner Cape. SpaceX has entered into the appropriate spectrum-access agreement with Cape to offer the service. Cape is the solely authorized user of this spectrum range in the testing area.² The demonstration will occur in the waters Northwest and Southeast of the Territory of Guam. Please see Appendix A for the specific test polygon in which SpaceX seeks to provide this demonstration in partnership with Cape.

SpaceX will ensure that any geographically adjacent licensees are protected from harmful interference by ensuring that its transmissions comply with the field strength limit established by 47 C.F.R. § 24.236 in the absence of any other coordination agreement between interested operators.

SpaceX requests a waiver of the SCS OOB limits (47 CFR § 25.202(k)) with respect to this testing. SpaceX will protect adjacent-channel operators by adhering to the -110.6 dBW/m²/MHz power-flux-density limit that the Commission has already determined to be adequately protective in PCS-G Block. As with SpaceX’s SCS service in cooperation with T-Mobile USA, Inc. and its subsidiaries (collectively, “T-Mobile”), requiring SpaceX to comply with the unnecessarily strict -120 dBW/m²/MHz limit would greatly hinder SpaceX’s ability to provide service, limiting the speed and reliability of its service throughout this demonstration.

SpaceX certifies that its direct-to-cellular system will operate without causing harmful interference to or requiring protection from any other service duly licensed in these bands or adjacent bands. 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, which links to the pagers of appropriate technical personnel 24/7.

¹ This would extend/renew SpaceX’s existing authorization for testing in Guam. *See*, Grant, ICFS File No. SAT - STA-20260605-00229 (granted June 15, 2026).

² *See Private Tech, Inc., FCC Application or Notification for Spectrum Leasing Arrangement*, FCC Form 608, ULS File No. 0012012345 (filed Apr. 27, 2026) (Cape holds exclusive rights to use of this spectrum pursuant to a lease from PTI Pacifica Inc.).

Appendix A

