REQUEST FOR SPECIAL TEMPORARY AUTHORITY

Space Exploration Holdings, LLC ("SpaceX"), pursuant to Section 25.120 of the Commission's rules, hereby requests Special Temporary Authority ("STA") for 60 days to operate its authorized non-geostationary orbit ("NGSO") second-generation ("Gen2") satellites using the 42.0-42.5 GHz band (space-to-Earth) for gateway downlink communications with duly authorized gateway earth stations.[1] SpaceX requests this STA while the Commission continues to process SpaceX's pending Gen2 Ku/V modification and Gen3 application, both of which formally request U.S. authority to use this band for NGSO fixed-satellite service ("FSS") downlink operations.[2] The Commission has already authorized SpaceX to use the 42.0-42.5 GHz band for NGSO FSS downlink operations outside the United States, and both SpaceX's newest generation of satellites and current gateway architecture already support the band.[3] The new high-capacity satellites are designed to support over ten times the capacity of current Starlink satellites, bringing Americans unprecedented fiber-like satellite internet speeds.[4]

SpaceX respectfully requests grant of this STA by September 15, 2026, the planned deployment date for the new high-capacity satellites.[5]

Grant of this STA is strongly in the public interest. Additional gateway downlink capacity in the 42.0-42.5 GHz band will improve Starlink backhaul capacity and increase internet speeds for Americans, including farmers, hikers, and rural families. The band is a natural extension of the 37.5-42.0 GHz FSS (space-to-Earth) allocation already authorized for the Gen2 system, and the Commission has proposed adding an FSS downlink allocation in its Spectrum Abundance proceeding.[6] Because the U.S. Table of Frequency Allocations currently allocates 42.0-42.5 GHz only to the Fixed and Mobile services, SpaceX requests a waiver of Section 2.106, to the extent

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1 See *Space Exploration Holdings, LLC*, Authorization and Order, DA 26-36 (SB rel. Jan. 9, 2026) ("Gen2 Upgrade Authorization"); *Space Exploration Holdings, LLC*, 37 FCC Rcd 14882 (2022) ("Gen2 Authorization"). Call Sign S2992/S3069.

2 See Application for Modification of Authorization for the SpaceX Gen2 NGSO Satellite System, ICFS File No. SAT-MOD-20260703-00275 (filed July 6, 2026) ("Gen2 Ku/V Modification"); Application of Space Exploration Holdings, LLC for Authority to Launch and Operate the SpaceX Gen3 NGSO Satellite System, ICFS File No. SAT-LOA-20260630-00264 (filed July 6, 2026) ("Gen3 Application").

3 See *Gen2 Upgrade Authorization* at 4 (authorizing 42.0-42.5 GHz (space-to-Earth) "outside the U.S. only").

4 See Starlink, *Starlink Version 3 Satellites*, https://starlink.com/updates/starlink-version-3-satellites.

5 *See SpaceX Scales Back Plans for Next Starship Launch,* SpaceNews*,* https://spacenews.com/spacex-scales-back-plans-for-next-starship-launch/.

6 See Satellite Spectrum Abundance, SB Docket No. 25-180, Further Notice of Proposed Rulemaking and Notice of Proposed Rulemaking, 40 FCC Rcd 3794, 3811, para. 46 (2025) ("Spectrum Abundance NPRM").

necessary, to operate on a non-interference, unprotected basis for the duration of the STA, and incorporates by reference the waiver showings in the pending applications.[7]

SpaceX will operate with the technical parameters set forth in the pending Gen2 modification. The space station extended V-band transmit beams in 42.0-42.5 GHz will be the same as those in the Gen2 Upgrade Applications and for brevity are not repeated here.[6] Downlink operations in 42.0-42.5 GHz in the United States will be the same as those the Commission approved for operations outside the United States. SpaceX will operate consistent with the PFD limits in the V-band authorized for the Gen2 system, and certifies that its operations will comply with the applicable International Telecommunications Union interference protection criteria.[8] SpaceX will operate under the STA 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, which links to the pagers of appropriate technical personnel 24/7/365.

Accordingly, SpaceX requests that the Commission expeditiously grant this STA to allow SpaceX to operate Gen2 satellites in the 42.0-42.5 GHz band (space-to-Earth) for 60 days while the Commission continues to consider the Gen2 Ku/V modification and Gen3 application.

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7 See 47 C.F.R. § 2.106(a); Gen2 Ku/V Modification, Waiver Request at 6-7; Gen3 Application, Waiver Request (42.0-42.5 GHz).

8 Gen2 Ku/V Modification, Technical Attachment at A-5 to A-6; *see also id.* at A-4 (PFD calculations in the requested V-band downlink beams "are the same as in the Gen2 Upgrade Applications").