



January 18, 2021

BY ELECTRONIC FILING

Kerry E. Murray
Federal Communications Commission
45 L Street, N.E.
Washington, DC 20554

Re: *IBFS File Nos. SES-LIC-20210311-00472, SES-LIC-20200422-00443, SES-LIC-20210423-00756, SES-LIC-20211027-01751*

Dear Ms. Murray:

SpaceX Services, Inc. ("SpaceX Services") has filed the above referenced license applications for authority to operate gateway earth stations in the 17.8-18.6 GHz, 18.8-19.3 GHz, 28.35-29.1 GHz, and 29.5-30.0 GHz bands. Authority to operate has been granted for all but one of these applications.

In the 27.5-28.35 GHz band, the Upper Microwave Flexible Use Service ("UMFUS") has a primary allocation, and FSS operations are permitted on a secondary basis. SpaceX requests that the above referenced license applications and related authorizations be modified or amended to permit operation in the 27.5-28.35 GHz frequency band on a secondary basis. Apart from the addition of the 27.5-28.35 GHz frequency band, all other technical details and analyses previously submitted with these license applications remain unchanged.

The SpaceX gateways can successfully operate on a secondary, non-harmful interference basis with UMFUS systems. The Comsearch Report submitted with this application confirms that SpaceX has coordinated with existing terrestrial licensees in this band in compliance with the Commission's rules¹, and can operate without causing harmful interference to any such deployments. No objections were received from any of the licensees for any of the gateways in question.

SpaceX recognizes that it must protect future UMFUS operations as well. In the event that SpaceX's operations create harmful interference to future UMFUS deployments, SpaceX will take any necessary steps to resolve the harmful interference, including through coordination with the affected stations pursuant to Section 25.136(f).

The grant of these modifications/amendments would improve the quality and quantity of SpaceX's services, which would increase the rate of broadband deployment throughout the United States. Accordingly, an expeditious grant of this application would serve the public interest.

¹ 47 CFR. §101.103(d)

Kerry Murray
January 18, 2021
Page 2 of 2

Sincerely,

David Liptsyn

David Liptsyn
Starlink Infrastructure Lead

SPACE EXPLORATION TECHNOLOGIES CORP.
22908 NE Alder Crest Dr.
Redmond, WA 98053
Tel: 425-602-8054
Email: David.Liptsyn@SpaceX.com