

REQUEST FOR SPECIAL TEMPORARY AUTHORITY

SpaceX Services, Inc. (“SpaceX Services”), pursuant to Section 25.120 of the Commission’s rules, hereby requests Special Temporary Authority (“STA”) to operate its gateway earth stations for up to 60 days to communicate with the first tranche of non-geostationary orbit (“NGSO”) satellites to be launched by its sister company, Space Exploration Holdings, LLC (“SpaceX”). SpaceX Services currently has applications pending for six Ku-band gateway earth stations, located in North Bend, WA; Conrad, MT; Merrilan, WI; Greenville, PA; Redmond, WA; and Hawthorne, CA.¹ It would operate each earth station under the requested STA with the technical characteristics set forth in the associated pending application.

The Commission has good cause to approve this request to enhance the safety of space. Specifically, the requested STA would permit SpaceX Services to communicate with the SpaceX NGSO satellites and conduct in-orbit testing during the orbit-raising phase. The requested STA would allow SpaceX to confirm the operational status of its satellites immediately upon insertion, rather than wait weeks while the satellites are orbit raising to ensure proper functioning. This testing would yield a number of public interest benefits. For instance, SpaceX could act quickly in the unlikely event of a performance issue with one of its spacecraft to identify and correct the problem even before the satellites reach operational orbit. Accordingly, the STA will serve the public interest by enhancing space safety and promoting the health and safety of SpaceX’s NGSO constellation.

SpaceX Services will operate on a non-interference basis. As set forth in the underlying earth station applications, these gateways will protect terrestrial and space systems in shared spectrum bands. Specifically, they will observe the applicable equivalent power flux-density (“EPFD”) limits set forth in Article 22 and Resolution 76 of the ITU Radio Regulations and the applicable power flux-density (“PFD”) limits set forth in the Commission’s rules and Article 21 of the ITU Radio Regulations, which the Commission has found sufficient to protect GSO systems and terrestrial systems, respectively, against harmful interference. In addition, SpaceX Services has completed frequency coordination for each of its proposed earth station sites, providing additional assurance that they can operate on a non-interference basis. In the extremely unlikely event that harmful interference should occur due to transmissions to or from its earth station, SpaceX Services will take all reasonable steps to eliminate the interference. Should an issue arise, SpaceX Services can be reached at satellite-operators-pager@spacex.com, which links to the pagers of appropriate technical personnel 24/7.

The first tranche of SpaceX satellites is scheduled to be launched in early May 2019. Accordingly, SpaceX Services requests that the Commission issue an STA structured to begin on the launch date and remain in force for up to 60 days.

¹ The IBFS file numbers for these earth station applications are SES-LIC-INTR2019-00877 through -00882, respectively. Those applications contain all relevant operational characteristics and are hereby incorporated herein to the extent necessary.