

Brian D. Weimer
202.747.1930 direct
bweimer@sheppardmullin.com

April 8, 2019

VIA IBFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington DC 20554

**Re: Space Exploration Holdings, LLC, IBFS File No. SAT-STA-20190405-00023
SpaceX Services, Inc., IBFS File Nos. SES-STA-INTR2019-01012, SES-STA-
INTR2019-01013, SES-STA-INTR2019-01014, SES-STA-INTR2019-01015, SES-
STA-INTR2019-01016, SES-STA-INTR2019-01017, SES-STA-INTR2019-01018**

Dear Ms. Dortch:

On April 5, 2019, Space Exploration Holdings, LLC and its sister company SpaceX Services, Inc. (collectively “SpaceX”) filed the above-captioned applications for special temporary authority (the “Applications”) in order to launch and operate their proposed non-geostationary (“NGSO”), fixed-satellite service system.¹ The Applications request authority, among other things, to launch the “first tranche” of NGSO satellites in SpaceX’s constellation by “early May 2019” and initiate communications between the satellites and one telemetry, tracking, and control earth station and six Ku-band earth stations for up to 60 days.²

¹ See Space Exploration Holdings, LLC, Request for Special Temporary Authority, IBFS File No. SAT-STA-20190405-00023 (filed Apr. 5, 2019); SpaceX Services, Request for Special Temporary Authority, IBFS File Nos. SES-STA-INTR2019-01012, *et. al.* (filed Apr. 5, 2019). See also Space Exploration Holdings, LLC, Application for Modification of Authorization for the SpaceX NGSO Satellite System, IBFS File No. SAT-MOD-20181108-00083 (filed Nov. 8, 2018).

² See, e.g., SpaceX Services, Request for Special Temporary Authority, IBFS File No. SES-STA-INTR2019-01013 at 1 (filed Apr. 5, 2019); see also *Space Exploration Holdings, LLC, Application for Approval for Orbital Deployment and Operating Authority for the SpaceX NGSO Satellite System*, Memorandum Opinion, Order and Authorization, 33 FCC Rcd 3391 (2018).

Pursuant to Commission rules,³ the Applications are currently “restricted” proceedings. WorldVu Satellites Limited (“OneWeb”) respectfully requests the *ex parte* status of these proceedings be converted from “restricted” to “permit-but-disclose.”⁴ Converting the *ex parte* status of these proceedings to “permit-but-disclose” would serve the public interest by allowing the Commission to establish a more complete record upon which to evaluate the significant legal and technical issues presented by the Applications.

Please do not hesitate to contact the undersigned with any questions.

Very truly yours,

/s/ Brian D. Weimer

Brian D. Weimer
for SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

cc: Thomas Sullivan, Chief, International Bureau
Jose Albuquerque, Chief, Satellite Division
Karl Kensinger, Deputy Chief, Satellite Division
Stephen Duall, Chief, Policy Branch, Satellite Division

³ See 47 C.F.R. § 1.1208.

⁴ See *id.* at § 1.1200 (stating the “Commission and its staff retain discretion to modify the applicable *ex parte* rules” in a particular proceeding when “the public interest so requires.”). See also *Applications Accepted for Filing: Cut-off Established for Additional NGSO-like Satellite Applications or Petitions for Operations in the 12.75-13.25 GHz, 13.85-14.0 GHz, 18.6-18.8 GHz, 19.3-20.2 GHz, and 29.1-29.5 GHz Bands*, Public Notice, 32 FCC Rcd 4180, 4183 (IB 2017) (“To provide for uniformity of treatment, we will also treat any other applications considered in this processing round under the ‘permit-but-disclose’ provisions of the *ex parte* rules”).

CERTIFICATE OF SERVICE

I, Samuel Swoyer, hereby certify that on this 8th day of April 2019, a copy of the foregoing letter is being sent via first class, U.S. Mail, postage paid, to the following:

Patricia Cooper
Vice President, Satellite Government Affairs
SPACE EXPLORATION TECHNOLOGIES CORP. &
SPACE X SERVICES, INC.
1155 F Street, N.W.
Suite 475
Washington, DC 20004

William M. Wiltshire
HARRIS, WILTSHIRE & GRANNIS LLP
1919 M Street, N.W.
Suite 800
Washington, DC 20036
*Counsel to Space Exploration Holdings, LLC &
SpaceX Services, Inc.*

/s/ Samuel Swoyer
Samuel Swoyer