

REQUEST FOR EXTENSION OF SPECIAL TEMPORARY AUTHORITY

On May 9, 2019, the Commission granted SpaceX Services, Inc. (“SpaceX Services”) Special Temporary Authority (“STA”) to operate a telemetry, tracking, and control (“TT&C”) earth station for up to 60 days to communicate with the first tranche of non-geostationary orbit (“NGSO”) satellites launched by its sister company, Space Exploration Holdings, LLC (“SpaceX”), on May 24, 2019.¹ SpaceX Services respectfully requests that the Commission extend that STA for an additional 60 days for the reasons discussed below.

SpaceX Services currently has an application pending for a TT&C earth station located in Brewster, WA.² It has operated the earth station pursuant to the STA for nearly two months and has received no complaints from any other authorized spectrum user.

The operation of these earth stations has enabled SpaceX Services to communicate with the SpaceX NGSO satellites and perform TT&C functions from the moment those satellites were inserted into orbit and throughout the process of raising them to their authorized operational altitude. While much of that phase is now complete, there are still some satellites that have yet to reach their authorized altitude. In addition, there are two spacecraft that are being intentionally de-orbited in order to assess performance during this phase of the mission. Extending the STA would allow SpaceX to continue to provide TT&C functions that are essential to commanding all of these spacecraft and ensuring continuing monitoring of and control over SpaceX’s nascent constellation. Accordingly, extension of the STA will continue serve the public interest by enhancing space safety and promoting the health and safety of SpaceX’s NGSO constellation.

SpaceX Services will continue to operate on a non-interference basis, and in conformance with 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 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.

Accordingly, SpaceX Services requests that the Commission extend the STA for this TT&C earth station for up to an additional 60 days.

¹ See Public Notice, Rep. No. SES-02161 (rel. May 15, 2019). As required under the STA, SpaceX confirmed the launch and commencement of operations date for its satellites, which began the term of the STA.

² See IBFS File No. SES-LIC-20190405-00453. That application contains all relevant operational characteristics and is hereby incorporated herein to the extent necessary.