

## 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 its gateway earth stations 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.<sup>1</sup> SpaceX Services respectfully requests that the Commission extend that STA for an additional 60 days for the reasons discussed below.

SpaceX Services currently has applications pending for Ku-band gateway earth stations in six locations: North Bend, WA; Conrad, MT; Merrillan, WI; Greenville, PA; Redmond, WA; and Hawthorne, CA.<sup>2</sup> It has operated these earth stations 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 conduct in-orbit testing during the orbit-raising phase. While much of that phase is now complete, there are still some satellites that have yet to reach their authorized altitude of 550 km. 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 monitor the operational status of its satellites to ensure proper functioning and determine operational capabilities. 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](mailto: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 these gateways for up to an additional 60 days.

---

<sup>1</sup> 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.

<sup>2</sup> The IBFS file numbers for these earth station applications are SES-LIC-20190402-00425 through -00427, and SES-LIC-20190402-00450, -00451, and -00454 (filed May 28, 2019) and SES-AMD-20190410-00520 through 00525 (May 31, 2019). Those applications contain all relevant operational characteristics and are hereby incorporated herein to the extent necessary.