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S2983/3018 SAT-STA-20190924-00098 Space Exploration Holdings, LLC IB2019003373

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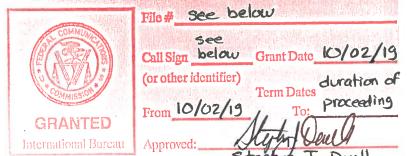
Brian D. Weimer 202.747.1930 direct bweimer@sheppardmullin.com

September 26, 2019

** CHANGE OF EX PARTE STATUS TO "PBD" ONLY *

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-20190924-00098

SpaceX Services, Inc., IBFS File Nos. SES-STA-INTR2019-03361, SES-STA-INTR2019-03362, SES-STA-INTR2019-03363, SES-STA-INTR2019-03364, SES-STA-INTR2019-03365, SES-STA-INTR2019-03366, SES-STA-INTR2019-03367, SES-STA-INTR2019-03368, SES-STA-INTR2019-03369, SES-STA-INTR2019-03370, SES-STA-INTR2019-03371, SES-STA-INTR2019-03372

SES-STA-20190925-01225 through -01234 and -01242 through -01244

Dear Ms. Dortch:

On September 24, 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 satellites in their proposed non-geostationary, fixed-satellite service system in accordance with SpaceX's pending modification application. The Applications request authority, among other things, to launch satellites in SpaceX's constellation "before the end of October" and place these satellites in orbital locations proposed in the SpaceX Second Modification Application but not currently authorized by the Commission.²

¹ See Space Exploration Holdings, LLC, Request for Special Temporary Authority, IBFS File No. SAT-STA-20190924-00098 (filed Sep. 24, 2019) ("STA Request"); SpaceX Services, Inc., Request for Special Temporary Authority, IBFS File Nos. SES-STA-INTR2019-03361, et. al. (filed Sep. 24, 2019). See also Space Exploration Holdings, LLC, Application for Modification of Authorization for the SpaceX NGSO Satellite System, IBFS File No. SAT-MOD-20190830-00087 (filed Aug. 30, 2019) ("SpaceX Second Modification Application").

² See, e.g., STA Request at 1; see also SpaceX Second Modification Application.

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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." 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

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 26th day of September 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. & SPACEX SERVICES, INC. 1155 F Street, N.W. Suite 475 Washington, DC 20004

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Counsel to Space Exploration Holdings, LLC & SpaceX Services, Inc.

<u>/s/</u>	Samuel	Swoyer	
Sar	nuel Sw	oyer	