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September 26, 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-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**

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.¹ 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.

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 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:

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/s/ Samuel Swoyer
Samuel Swoyer