



February 12, 2021

VIA IBFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
45 L Street NE
Washington, DC 20554

**Re: *SpaceX Services, Inc.*
 IBFS File Nos. SES-STA-20210119-00138; SES-STA-20201120-01330;
 SES-LIC-20200410-00399**

Dear Ms. Dortch:

Hughes Network Systems, LLC (“Hughes”) files this letter in support of the opposition of WorldVu Satellites Limited (“OneWeb”) to the above-referenced applications (“Applications”) filed by SpaceX Services, Inc. (“SpaceX”) to operate a Ka-band gateway earth station in Litchfield, CT (the “Litchfield Earth Station”).¹

Hughes shares OneWeb’s concerns regarding SpaceX’s decision to locate its Litchfield Earth Station a mere 11.7 km from OneWeb’s authorized Southbury Earth Station,² threatening to significantly degrade gateway operations at this location.³ Hughes is producing electronic components for use in OneWeb’s gateway earth station facilities while also partnering with OneWeb to conduct commercial trials with key U.S. government customers at certain gateway locations—including the Southbury Earth Station. Thus, as both a commercial partner to (and equity investor in) OneWeb, Hughes maintains a strong interest in ensuring a stable and predictable NGSO interference environment.

To that end, OneWeb has provided credible interference analyses demonstrating that SpaceX’s proposed Litchfield Earth Station operations would jeopardize the ability of OneWeb to provide critical gateway connectivity services from the Southbury Earth Station.⁴ Hughes concurs with OneWeb’s analysis that “significant, negative operational impacts” would occur as a result of SpaceX’s decision to site a Ka-band gateway earth station near its Southbury Earth Station.⁵ SpaceX’s siting decision is all the more puzzling to Hughes given that SpaceX had knowledge of OneWeb’s intended deployment at the Southbury Earth Station well in advance of filing license applications and STA requests for the Litchfield Earth Station.⁶

¹ OneWeb Opposition Letter, IBFS File Nos. SES-STA-20210119-00138; SES-STA-20201120-01330 (filed Jan. 29, 2021) (“OneWeb Opposition”).

² See *WorldVu Satellites Limited*, Grant of Authority, IBFS File No. SES-LIC-20180727-02076 (granted Aug. 24, 2020) (the “Southbury Earth Station”). The Southbury Earth Station operates on the same Ka-band frequencies as the Litchfield Earth Station proposes: the 17.8-18.6 GHz, 18.8-19.3 GHz, 27.5-29.1 GHz, and 29.5-30.0 GHz bands.

³ See OneWeb Opposition at 1; Comments of OneWeb, IBFS File No. SES-LIC-20200410-00399; Call Sign E201606 (filed Nov. 6, 2020) (“OneWeb Comments”); Reply of OneWeb, IBFS File No. SES-LIC-20200410-00399; Call Sign E201606 (filed Dec. 2, 2020) (“OneWeb Reply”).

⁴ OneWeb Comments at 2—7.

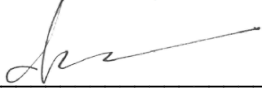
⁵ *Id.* at 5.

⁶ *Id.* at 5—6.

In light of these unresolved interference concerns, and the negative impact SpaceX's operations would pose to the ongoing commercial operations at the Southbury Earth Station, Hughes joins OneWeb in urging the FCC to refrain from any action on the Applications until SpaceX conclusively demonstrates in the record that the operation of the Litchfield Earth Station will not cause interference to OneWeb's Southbury Earth Station.

Kindly contact the undersigned with any questions.

Respectfully submitted,



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cc:
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CERTIFICATE OF SERVICE

I hereby certify that, on this 12th day of February 2021 a copy of the foregoing pleading was sent via electronic mail and First Class Mail to:

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