

REQUEST FOR SPECIAL TEMPORARY AUTHORITY

SpaceX Services, Inc. (“SpaceX Services”), pursuant to Section 25.120 of the Commission’s rules, hereby requests Special Temporary Authority (“STA”) for 60 days to allow communications between its authorized high performance earth stations in motion (“HP ESIMs”) and satellites soon to be launched by its sister company, Space Exploration Holdings, LLC (“SpaceX”), under the recently granted authorization for its second-generation (“Gen2”) non-geostationary orbit (“NGSO”) constellation.¹ An application to add the Gen2 system as a point of communication for this ESIM authorization (call sign E210310) is currently pending.² SpaceX Services will operate its HP ESIMs in the same manner and with the same parameters with Gen2 satellites as it does with current SpaceX satellites.

SpaceX currently anticipates that it will begin launching Gen2 satellites before the end of December 2022. Granting this STA would serve the public interest by allowing ships, vehicles, and aircraft in motion to use SpaceX Services’ HP ESIMs to access the increased capacity for low latency broadband services from SpaceX’s upgraded, next-generation NGSO system as soon as its satellites are deployed, even as the underlying applications are being processed.

SpaceX Services will operate on a non-interference basis. Consistent with SpaceX’s Gen2 authorization, SpaceX Services will observe 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. Nonetheless, in the extremely unlikely event that harmful interference should occur due to transmissions to or from its spacecraft, 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.

For the foregoing reasons, the Commission should find that these temporary operations while SpaceX Services’ application is being processed would serve the public interest and grant an STA structured to begin on the Gen2 launch date and remain in force for up to 60 days thereafter.

¹ See *Space Exploration Holdings, LLC*, FCC 22-91 (rel. Dec. 1, 2022).

² SpaceX Services has not requested any modifications to its ESIM authorization other than the addition of the Gen2 system as a point of communication.