

## 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”) to operate a telemetry, tracking, and control (“TT&C”) earth station for up to 60 days to communicate with the first tranche of non-geostationary orbit (“NGSO”) satellites to be launched by its sister company, Space Exploration Holdings, LLC (“SpaceX”). SpaceX Services currently has an application pending for a TT&C earth station located in Brewster, WA.<sup>1</sup> It would operate the earth station under the requested STA with the technical characteristics set forth in that pending application, with transmissions occurring in the following frequencies: 12.221 GHz (downlink) and 13.925 GHz (uplink).

The Commission has good cause to approve this request to enhance the safety of space. Specifically, the requested STA would cover TT&C functions from the moment the SpaceX satellites are inserted into orbit and as they are raised to their authorized operational altitude. These functions are essential to commanding the spacecraft and ensuring continuing monitoring of and control over SpaceX’s nascent constellation. Accordingly, the STA will serve the public interest by enhancing space safety and promoting the health of SpaceX’s NGSO constellation.

SpaceX Services will operate on a non-interference basis. As set forth in the underlying earth station applications, these gateways will protect terrestrial and space systems in shared spectrum bands. Specifically, they 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. In addition, SpaceX Services has completed frequency coordination for its proposed earth station site and demonstrated that its operations will not affect U.S. Navy or NASA systems in the band, providing additional assurance that it can operate on a non-interference basis. 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.

The first tranche of SpaceX satellites is scheduled to be launched in early May 2019. Accordingly, SpaceX Services requests that the Commission issue an STA structured to begin on the launch date and remain in force for up to 60 days.

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<sup>1</sup> See IBFS File No. SES-LIC-INTR2019-00966. That application contains all relevant operational characteristics and is hereby incorporated herein to the extent necessary.