REQUEST FOR EXTENSION OF SPECIAL TEMPORARY AUTHORITY

On July 31, 2020, the Commission granted SpaceX Services, Inc. ("SpaceX Services") Special Temporary Authority ("STA") to operate seventeen gateway earth stations for up to 60 days to communicate with non-geostationary orbit ("NGSO") satellites launched by its sister company, Space Exploration Holdings, LLC ("SpaceX") during the orbit-raising and de-orbit phases and early operations of its satellites. SpaceX anticipates a regular cadence of further launches throughout 2020, which will require additional authorization for communications with these earth stations. Accordingly, SpaceX Services respectfully requests that the Commission extend this STA for an additional 60 days for the reasons discussed below.

SpaceX Services currently has applications pending for seventeen Ka-band gateway earth stations (located in Slope County, ND; Manistique, MI; Los Angeles County, CA; Cass County, ND; Prudhoe Bay, AK; Sanderson, TX; Springer, OK; Hitterdal, MN; Tionesta, CA; Butte, MT; Colburn, ID; Baxley GA; Robertsdale, AL; Prosser, WA; Roll, AZ; Vernon, UT; and Inman, KS).² It has operated all of these earth stations pursuant to STAs for the last two months and has received no complaints from any other authorized spectrum user. The operation of these earth stations has enabled SpaceX Services to communicate with the SpaceX NGSO satellites. Extending the STA would allow SpaceX to continue to monitor the operational status of its satellites to ensure proper functioning and determine operational capabilities. Accordingly, extension of the STA will continue to serve the public interest by enhancing space safety and promoting the health and safety of SpaceX's NGSO constellation.

SpaceX Services will continue to operate on a non-interference basis, and in conformance with 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 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, which links to the pagers of appropriate technical personnel 24/7.

Accordingly, SpaceX Services requests that the Commission extend the STA for these gateways for an additional 60 days.

¹ See Grant Stamp, SES-STA-20200424-00450, SES-STA-20200504-00489, SES-STA-20200507-00504, SES-STA-20200608-00599, SES-STA-20200702-00690, SES-STA-20200710-00742, and SES-STA-20200721-00783 (July 31, 2020). These STAs expire on September 30, 2020.

 $^{^2~}See~SES-LIC-20200422-00442,~SES-LIC-20200422-00443,~SES-LIC-20200428-00458,~SES-LIC-20200430-00472,~SES-LIC-20200430-00471,~SES-LIC-20200505-00498,~SES-LIC-20200528-00576,~SES-LIC-20200616-00649,~SES-LIC-20200616-00645,~SES-LIC-20200616-00648,~SES-LIC-20200616-00647,~SES-LIC-20200616-00646,~SES-LIC-20200616-00650,~SES-LIC-20200701-00687,~SES-LIC-20200701-00686,~SES-LIC-20200709-00735,~and~SES-LIC-20200714-00758,~respectively.$