

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 fixed user terminal (“HP-UT”) earth stations and satellites soon to be launched by its sister company, Space Exploration Holdings, LLC (“SpaceX”), under the recently granted authorization for its Gen2 non-geostationary orbit (“NGSO”) constellation.¹ An application to add the Gen2 constellation as a point of communication for the underlying HP-UT authorization (call sign E220009) is currently pending.² SpaceX Services proposes to operate its HP-UTs consistent with the terms of its underlying license when communicating with Gen2 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 users across America (including its territories and possessions), especially those in underserved or unserved areas, 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 HP-UT application is 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 HP-UT authorization other than the addition of the Gen2 system as a point of communication.