

January 20, 2020

VIA ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC

Re: *Notice of Ex Parte Communications, WC Docket No. 19-126; WC Docket No. 10-90*

Dear Ms. Dortch:

On January 16, 2020, Lauren Lyons and David Goldman of Space Exploration Technologies Corp. (“SpaceX”) met with Jonathan McCormack, Kirk Burgee, Margaret Wiener, Alexander Minard, Katie King, and Nathan Eagan of the Wireline Communications Bureau and the Office of Economics and Analytics.

SpaceX discussed the Commission’s proposed rules for its Rural Digital Opportunity Fund. SpaceX provided an update on progress of its Starlink satellite broadband constellation, noting that it has already deployed more than 180 of its own satellites. Due to SpaceX’s aggressive launch schedule, SpaceX is targeting service in the Northern U.S. and Canada in 2020, rapidly expanding to near global coverage of the populated world by 2021. The system is specifically designed to effectuate the same goal as the Commission’s program: to enable affordable broadband service to rural and remote areas across the country.

As SpaceX has previously noted, the most effective way to reach unserved and underserved Americans is to leverage advanced technology through smart private sector investment. Yet, if Government funding programs are updated to reflect new capabilities, they can create a stronger incentive for industry to optimize its investments and innovation to align with the Commission’s goals. Specifically, the Commission can focus its funding programs on performance goals, rather than more detailed technology-driven requirements that can risk stifling innovation and ingenuity. By applying aggressive speed and latency targets alongside clear milestones for actual service to consumers, the Commission would empower providers to develop more efficient technology and ensure that systems are built to actually connect Americans with high-speed, low-latency broadband.

At the meeting, SpaceX also raised its concern that paragraph 37 of the draft order may unintentionally and incorrectly imply that low earth orbit satellites cannot deliver service at latencies that meet the program’s low-latency thresholds. SpaceX explained that orbital altitudes are the driving factor for latency for satellite-based systems, and that its low-earth-orbiting Starlink system can provide service that well-exceed the standards the Commission set for truly low-latency service.

Finally, SpaceX reiterated its position that the Commission should not adopt a standalone voice requirement. Instead, the Commission can drive better service for consumers by

requiring providers that receive funding to operate at latencies capable of providing Voice over Internet Protocol service. When given the option, most Americans now choose among diverse services; consumers in rural and remote areas should not be relegated to older technologies.

SpaceX looks forward to continuing to work with the Commission to consider the best ways to spur innovation and ensure all Americans have high-throughput, low-latency broadband.

Very best regards,

/s/ David Goldman

David Goldman
Director of Satellite Policy

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The SpaceX logo is located in the bottom right corner of the page. It consists of the word "SPACEX" in a bold, blue, sans-serif font, followed by a stylized grey swoosh that curves upwards and to the right.