

June 9, 2021

Federal Communications Commission
Wireline Competition Bureau
45 L Street NE
Washington, DC 20554

RE: *Telecommunications Carriers Eligible to Receive Universal Service Support, WC Docket No. 09-197*

Dear Secretary:

Starlink Services, LLC (“Starlink Services”) hereby replies to a letter filed by the Affiliated Tribes of Northwest Indians (“ATNI”) filed in the above-captioned docket on May 25, 2021.

For too long, broadband providers have left Tribal lands behind. For example, while 99% of urban households have access to broadband with speeds of 25 Mbps, only 65% of households in American Indian and Alaska Native communities have the same level of access.¹ Space Exploration Technologies Corp. (“SpaceX”) therefore made connecting Tribal lands one of its first priorities, including making the Hoh Tribe in Washington its first commercial customers. These services already far exceed the Commission’s definition of broadband.

Starlink Services takes ATNI’s concerns extremely seriously. For example, ATNI expressed concern that “Tribal lands are being claimed in applications without consultation or input from the Tribes on those applications.”² Starlink Services agrees that all applicants should engage with the Tribes in their Rural Digital Opportunity Fund (“RDOF”) areas. Starlink Services has therefore engaged with all Tribal authorities within its provisionally awarded RDOF census blocks, including but not limited to providing notice of its Eligible Telecommunications Carrier (“ETC”) application to each affected Tribe. In many instances, Starlink Services met directly with Tribal authorities to discuss its RDOF plans and services. For example, in Oregon, Starlink Services has met with each of the eight federally recognized Tribes overlapping its RDOF service area. Additionally, Starlink Services spoke at ATNI’s telecom committee and general session on March 25 and 26. Starlink Services understands that ATNI’s concerns related to the provision of federal funds for broadband on Tribal lands are broader than Starlink Services’s ETC petition and encourages other RDOF applicants to also engage with the Tribes in their areas.

¹ <https://www.bia.gov/service/infrastructure/expanding-broadband-access>.

² Letter from Leonard Forsman, President, ATNI to Federal Communications Commission, Wireline Competition Bureau, Telecommunications Access Policy Division, WC Docket 09-197 (filed May 25, 2021).

As SpaceX has demonstrated across the country, its network can provide Tribal lands with true high-speed, low-latency service. In fact, SpaceX is proud to have already begun providing this high-quality service to several Tribes in the Northwest through its beta program. While SpaceX already serves tens of thousands of customers across the country, SpaceX and Starlink Services will be able to add millions more with service that meets and exceeds the RDOF requirements. Critically, SpaceX and Starlink Services will be able to connect the most remote and rural areas faster than most terrestrial deployments and at prices comparable to other services provided in the area.

Starlink Services looks forward to increasing access to high-speed, low latency broadband to Tribal areas in its RDOF census blocks. In the meantime, SpaceX and Starlink Services look forward to engaging even further with both ATNI and other Tribal leadership to ensure their needs are met.

Respectfully submitted,

/s/ David Goldman

David Goldman

Director of Satellite Policy

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