



VIA ELECTRONIC FILING

Marlene H. Dortch
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: Written *Ex Parte* Submission
Streamlining Licensing Procedures for Small Satellites, IB Docket No. 18-86**

Dear Ms. Dortch:

Maxar Technologies Holdings Inc. (“Maxar”) submits this written *ex parte* in support of proposals to add authority for inter-satellite links in 8025-8400 MHz band (the “X-band”).

Specifically, the Commercial Spaceflight Federation, Analytical Space, Inc., and the Commercial Smallsat Spectrum Management Association offered proposals in response to the Commission’s Notice of Proposed Rulemaking (“NPRM”) in the above-captioned proceeding to align the X-Band Earth exploration satellite service (“EESS”) allocation with the EESS 2025-2110 MHz and 2200-2290 MHz (“S-band”) allocation by adding a ‘space-to-space’ direction to the EESS X-band.¹ These comments confirm the Commission’s belief that “other frequency bands may be appropriate to identify for facilitating inter-satellite communications.”²

Allowing EESS X-band space-to-space links would enable new applications for remote sensing satellites. Maxar and its subsidiary companies already use the X-band for high-data operations like remote sensing, so adding space-to-space authority would provide efficiencies, allowing Maxar to use their same hardware to make inter-satellite links more accessible.

For these reasons, Maxar urges the Commission to promote the adoption of a space-to-space EESS X-band allocation both in the US Table of Frequency Allocations and by the International Telecommunication Union.

¹ See Comments of the Commercial Spaceflight Federation, at 7-8; Comments of Analytical Space, Inc., at 4; Comments of the Commercial Smallsat Spectrum Management Association, at 54. Maxar is a member of the Commercial Spaceflight Federation.

² *Streamlining Licensing Procedures for Small Satellites*, Notice of Proposed Rulemaking, FCC 18-44, at para. 72 (2018).



Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Michael Gold".

Michael Gold
Vice President, Regulatory and Policy
Maxar Technologies Holdings Inc.