

December 4, 2019

VIA ELECTRONIC FILING

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

Re: *Notice of Ex Parte Communications, RM-11768; IB Docket No. 18-313; IBFS File Nos. SAT-MOD-20190830-00087 and SAT-LOA-20190704-00057*

Dear Ms. Dortch:

This is to inform you that on December 2 and 3, 2019, representatives of Space Exploration Technologies Corp. (“SpaceX”) met with Chairman Pai, Commissioner O’Rielly, Commissioner Carr, Commissioner Starks, and staff from the Commission’s International Bureau with respect to the above referenced proceedings. Participants in the meetings are listed in Attachment A hereto.

In the meetings, SpaceX explained how its pending modification¹ to respace its satellites to new planes will help speed broadband coverage throughout the United States.

SpaceX also explained how its design and operations exceed all regulatory requirements to mitigate orbital debris and avoid collisions in space. SpaceX plans to continue optimizing its system responsibly regardless of whether any new regulations are adopted.² But if the government does decide to update its rules, the rules must apply equally to U.S. and non-U.S. satellite operators that are authorized to provide service in the United States. Otherwise, many operators will continue to seek out other licensing administrations to avoid the Commission’s safeguards, ultimately to the detriment of the overall space environment.

SpaceX also mentioned the importance for consumers and competition that the Commission consider Amazon’s application for a new satellite constellation³ as part of new processing round, on equal footing alongside other potential applicants.

SpaceX discussed the importance of the 12.2-12.7 GHz band for its service. SpaceX noted it is working to develop coordination strategies to address proposals from several Multichannel Video and Data Distribution Service (“MVDDS”) licensees that the Commission grant them an additional mobile allocation. It appears that the current plans for conversion of MVDDS spectrum to mobile use will have an enormous detrimental

¹ See Application, IBFS File No. SAT-MOD-20190830-00087 (filed Aug. 30, 2019).

² See *Mitigation of Orbital Debris in the New Space Age*, 33 FCC Rcd. 11352 (2018).

³ See Application, IBFS File No. SAT-LOA-20190704-00057 (filed July 4, 2019).

effect on SpaceX's ability to serve American consumers.⁴ SpaceX expressed its hope that the Commission not act on these petitions until a viable coordination strategy has been agreed upon.

Very best regards,

/s/ David Goldman

David Goldman
Director of Satellite Policy

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⁴ See Petition of MVDSS 5G Coalition for Rulemaking, RM-11768 (filed Apr. 26, 2016).

**ATTACHMENT A
LIST OF PARTICIPANTS**

Chairman Pai's Office

Chairman Ajit Pai
Aaron Goldberger

Commissioner O'Rielly's Office

Commissioner Michael O'Orielly
Erin McGrath
Arielle Roth

Commissioner Carr's Office

Commissioner Brendan Carr
Will Adams

Commissioner Starks Office

Commissioner Geoffery Starks
William Davenport

International Bureau

Jose Albuquerque
Jennifer Gilsenan
Karl Kensinger
Kerry Murray
Paul Blais
Jay Whaley
Stephen Duall
Katheryn Medly
Joe Hill (by phone)

SpaceX

Mark Juncosa
Patricia Cooper
David Goldman
Tim Hughes (for discussion with Chairman Pai only)