

October 24, 2019

BY ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

Re: *Space Exploration Holdings, LLC, IBFS File No. SAT-STA-20190924-00098;*
SpaceX Services, Inc., IBFS File Nos. SES-STA-20190925-01225 through -01234
and -01242 through -01244

Dear Ms. Dortch:

Space Exploration Holdings, LLC and SpaceX Services, Inc. (collectively, “SpaceX”) have filed the above referenced requests for special temporary authority (“STA”) for their respective space and earth stations to communicate during the early portions of the mission after the next launch of satellites for SpaceX’s non-geostationary orbit constellation. In order to aid the Commission’s evaluation of those applications, this letter provides supplemental detail of the phases planned for this launch and deployment of satellites.

- Upon launch, SpaceX will insert the satellites in a circular orbit at an injection altitude of approximately 280 km.
- During the first week following deployment, SpaceX will establish contact with all satellites and begin to orbit raise them all toward an altitude of 350 km over the course of two weeks.
- Following initial testing, 20 of these satellites will be raised further to the operational altitude of 550 km. These satellites will be deployed to an orbital plane already covered by SpaceX’s current authorization.¹
- The remaining satellites will stay at the 350 km altitude for at least 40 days before orbit raising to the operational altitude of 550 km. These satellites would be deployed in one of the new orbital planes covered by SpaceX’s pending modification application.²

SpaceX will, of course, coordinate the movement of its satellites with other affected parties, including NASA with respect to the International Space Station.

¹ See *Space Exploration Holdings, LLC*, 34 FCC Rcd. 2526 (IB 2019).

² See Application, IBFS File No. SAT-MOD-20190830-00087 (filed Aug. 30, 2019).

HARRIS, WILTSHIRE & GRANNIS LLP

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Should you have any questions, please do not hesitate to contact me.

Sincerely,



William M. Wiltshire
Counsel to SpaceX

cc: Jose Albuquerque
Stephen Duall
Brian D. Weimer
Nickolas G. Spina