

January 21, 2025

**BY ELECTRONIC FILING**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
45 L Street, NE  
Washington, DC 20554

Re: *Space Bureau Order and Authorization of SpaceX SCS Applications*, DA 24-1193, ICFS File Nos. SAT-MOD-20230207-00021 and SAT-AMD-20240322-00061, *et al.*

Dear Ms. Dortch:

The Mobile Satellite Services Association (“MSSA”) submits this letter to express concerns about recent actions by the Space Bureau (“*Bureau Order*”), which will allow SpaceX to dominate large swaths of spectrum outside of the United States while severely undermining the growth of a truly competitive Direct-to-Device (“D2D”) ecosystem that will provide multiple, innovative service offerings to the public.

MSSA is a non-profit industry association that seeks to promote and advance the emerging D2D ecosystem and support the efforts of D2D solutions providers—including terrestrial mobile and satellite operators, OEMs, infrastructure, chip vendors, and others.<sup>1</sup> MSSA is focused on facilitating a global ecosystem utilizing spectrum already allocated and licensed for Mobile Satellite Service (“MSS”) and well-suited for integration into a broad range of mobile devices. Given the critical role that emerging D2D services will play in expanding connectivity and enabling competition across multiple large and diverse segments, MSSA and its members have closely monitored the Commission’s ongoing activities to enable D2D, including in the Supplemental Coverage from Space (“SCS”) context.

MSS operators—including but not limited to MSSA members—are already leveraging spectrum resources in the 1429-2690 MHz band to support a variety of critical connectivity applications (including for safety-of-life, emergency response, and national security). These same operators are actively seeking to leverage cutting-edge technologies to bring innovative services to the public—and are investing billions of

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<sup>1</sup> Additional information on the MSSA can be found at <https://www.mss-association.org/>.

dollars to do so. The evolving D2D ecosystem offers particularly exciting possibilities in this respect.

But the Bureau’s sweeping decision to allow a single operator to dominate the 1429-2690 MHz band risks undermining both existing MSS operations and ongoing developments in D2D. Many portions of that band are already allocated to, and actively used for, the provision of MSS in other regions—a fact that the *Bureau Order* largely ignores. The *Bureau Order* similarly fails to explain how SpaceX’s operations would be compatible with existing and planned MSS operations, as well as the existing domestic and international MSS frameworks. These results are plainly inconsistent with the Commission’s primary objective of “minimizing the risks of harmful interference as [D2D] technology” evolves, and limiting authorized SCS operations to bands in which such operations “present less technically complex interference protection scenarios”<sup>2</sup>

Given the scope and scale of SpaceX’s NGSO system, SpaceX’s planned SCS operations would inevitably have significant consequences for existing and planned MSS operations, even if SpaceX were to proceed on an ostensibly non-interference basis. All indications are that other MSS operators would suffer significant impairments in terms of availability and capacity if SpaceX were allowed to operate across this spectrum.

In addition, it is not appropriate for the Commission to get out ahead of other Administrations and regulators when it comes to evaluating and managing the interference impacts of SpaceX’s operations in their regions. These regulators should be afforded the opportunity to evaluate the merits of any application to use spectrum in their territories within their context of their own rules and needs without any undue influence beforehand.

Further, by authorizing SpaceX to operate as “SCS” in portions of the 1429-2690 MHz band outside the United States the Bureau neglected to address the policy rationale for sidestepping the Commission’s processing round rules. The Commission generally relies on a processing round approach for authorizing MSS systems to promote competition and apply spectrum sharing rules that ensure that multiple operators are able to operate in the MSS spectrum bands at issue. But the approach taken in the *Bureau Order* ignores these longstanding procedures and does not adequately address how doing so is in the public interest.

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<sup>2</sup> *Single Network Future: Supplemental Coverage from Space*, 39 FCC Rcd 2622, ¶ 39 (2024).

MSSA appreciates the Commission's efforts to advance the interests of the satellite industry generally and D2D connectivity specifically. But the *Bureau Order* risks undermining the nascent and evolving D2D ecosystem and stifling innovation and competition for the benefit of one operator. MSSA urges the Bureau to re-evaluate the *Bureau Order* and ensure that it promotes, rather than impedes, the emergence of sustainable competition and continuous innovation in both the United States. and abroad.

Respectfully submitted,

/s/

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