

March 10, 2025

BY ELECTRONIC FILING

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

Re: Application of Space Exploration Holdings, LLC, ICFS File No. SAT-AMD-20241017-00228

Dear Ms. Dortch:

The Mobile Satellite Services Association (“MSSA”) writes to express serious concerns with respect to SpaceX’s recently amended application for expanded authority to conduct second-generation Starlink operations. Among other things, SpaceX seeks authority to operate up to 7,500 “Gen2” satellites across the 1429-2690 MHz band, including to support mobile-satellite service (“MSS”) operations outside of the United States.¹ But the MSS portions of this band are generally unavailable for new applicants² and SpaceX makes absolutely no effort to demonstrate that it would be able to operate without causing harmful interference to authorized MSS networks. Absent that showing, there is no basis upon which the Commission could possibly find that SpaceX’s proposed operations would serve the public interest. The Commission therefore must deny SpaceX’s applications.

MSSA is a non-profit industry association that seeks to promote and advance the emerging direct-to-device (“D2D”) ecosystem and support the efforts of D2D solutions providers—including terrestrial mobile and satellite operators, OEMs, infrastructure, chip vendors, and others.³ MSSA is focused on facilitating a global ecosystem utilizing spectrum already allocated and licensed for 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

¹ See ICFS File No. SAT-AMD-20241017-00228, Narrative at 5 (Oct. 17, 2024).

² See Space Exploration Holdings, LLC, DA 24-300 (Mar. 26, 2024).

³ Additional information on the MSSA and its diverse membership of L and S-band MSS operators, infrastructure providers, chip vendors and others can be found at <https://www.mss-association.org/> and <https://www.mss-association.org/members>.

diverse segments, MSSA and its members have closely monitored the Commission's ongoing activities to enable D2D, including in various licensing and rulemaking contexts.

MSS operators—including but not limited to MSSA members—are already utilizing 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 dollars to do so. The evolving D2D ecosystem offers particularly exciting possibilities in this respect.

SpaceX's proposed operations would undermine existing and planned MSS operations in the 1429-2690 MHz band. As the Commission has noted, it is prohibitively difficult for multiple MSS networks to operate on an overlapping, co-frequency basis without causing harmful interference to each other.⁴ And, notably, SpaceX makes no effort whatsoever to demonstrate that it would somehow be able to access and use this spectrum for MSS while protecting other MSS operators.

MSSA appreciates the Commission's efforts to advance the interests of the satellite industry generally and D2D connectivity specifically. But SpaceX's proposed operations risk undermining existing and future MSS operations, and SpaceX does not provide sufficient technical analysis to demonstrate that it would somehow mitigate that risk. SpaceX's application should be denied on that basis.

Respectfully submitted,

/s/

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⁴ See, e.g., *Amendment of Part 2 of the Commission's Rules for Federal Earth Stations with Non-Federal Satellite Service Space Stations*, 28 FCC Rcd 6698, ¶ 13 n.25 (2013) (noting that MSS earth stations “often use omni-directional antennas on portable devices which makes it extremely difficult to avoid causing interference to other satellites sharing the same spectrum.”).