



April 12, 2024

**BY ELECTRONIC FILING**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
45 L Street, N.E.  
Washington, DC 20554

Re: *ICFS File No. SAT-MOD-20230207-00021; ELS File Nos. 2479-EX-ST-2023 and 0519-EX-ST-2024*

Dear Ms. Dortch:

Supplemental Coverage from Space has the potential to truly connect the world and eliminate dead zones in terrestrial coverage. Yet, Omnispace has joined with Echostar as part of a global campaign to oppose U.S. efforts to enable this technology, making increasingly outlandish claims to try to block service, particularly by American operators. In its latest filing, Omnispace resorts to misrepresentations and inventing regulatory barriers, attempting to hinder even the testing of satellites designed to provide this new service to Americans.<sup>1</sup> EchoStar, a member of the same coalition, subsequently filed a letter mimicking Omnispace.<sup>2</sup> Despite these parties' latest claims, SpaceX has complied with every relevant regulation and condition on its authorizations. And while Omnispace and Echostar continue to plumb deeper waters in their fishing expeditions, both refuse SpaceX's repeated attempts to coordinate in good faith on behalf of their respective administrations.

As the Commission has recognized, testing at lower altitudes promotes more sustainable orbits by allowing operators to ensure their satellites are operating nominally before moving to operational altitudes. These lower orbits are self-cleaning, meaning satellites with any issues can be quickly deorbited. Hence, as part of the authorization the Commission granted SpaceX, it allowed SpaceX to test its direct-to-cell satellites at these lower, more sustainable altitudes before orbit raising the satellites. SpaceX's operations have remained consistent with its authorization.<sup>3</sup>

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<sup>1</sup> Letter from Mindel De La Torre to Marlene H. Dortch, Call Sign WW9XPI and DA 24-280 (Apr. 9, 2024) ("Omnispace Letter").

<sup>2</sup> Letter from Jennifer A. Manner to Marlene H. Dortch, ICFS File No. SAT-MOD-20230207-00021; ELS File Nos. 2479-EX-ST-2023 & 0519-EX-ST-2024 (Apr. 10, 2024) (attaching e-mail).

<sup>3</sup> Special Temporary Authorization, Call Sign WW9XPI, ELS File Nos. 2479-EX-ST-2023 (granted Dec. 20, 2023) and 0519-EX-ST-2024 (granted Apr. 1, 2024). Although SpaceX has complied with all of its current license obligations in testing its direct-to-cell satellites at altitudes below 400 km, out of an abundance of caution, SpaceX is filing a request for special temporary authority that would unequivocally allow that testing to continue while the Commission considers SpaceX's request to use the 340 km to 360 km shells of its second-generation system on a permanent basis.

SpaceX has also gone beyond its obligation to provide testing information to other operators, by providing information to operators like Omnispace and EchoStar that cannot potentially be affected by SpaceX's testing. SpaceX has repeatedly demonstrated that its direct-to-cell operations will not cause harmful interference to any in-band, out-of-band, or cross-border users, including Omnispace and EchoStar (to the extent they have systems to protect), even at full deployment, let alone the very limited testing subject to its Special Temporary Authority.<sup>4</sup>

But Omnispace's claim that SpaceX is not coordinating is its most perplexing assertion, as it is contradicted by its own filing. SpaceX has asked Omnispace for months to coordinate, including setting up a videoconference specifically to initiate coordination discussions. But each of these overtures has either been ignored or outright rejected by Omnispace. As demonstrated in the email chain that Omnispace itself attached to its latest letter, SpaceX offered to coordinate as recently as last Sunday.<sup>5</sup> That followed a similar offer last week<sup>6</sup> and a videoconference in December at which Omnispace explicitly stated that it did *not* want to coordinate.<sup>7</sup> Just as puzzling, EchoStar recently reversed course from its previous requests to coordinate, now claiming with no support that it is not required to coordinate with SpaceX. Nonetheless, SpaceX is willing to coordinate whenever Omnispace or Echostar is available. SpaceX also welcomes the regulators from the parties' respective home countries to join the discussions if that helps facilitate resolution. SpaceX looks forward to learning more about Omnispace's and Echostar's actual operations so it can better understand their concerns.

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<sup>4</sup> See, e.g., Letter from David Goldman to Marlene H. Dortch, GN Docket No. 23-135 and ICFS File No. SAT-MOD-20230207-00021, Attachment B (July 26, 2023); Letter from David Goldman to Marlene H. Dortch, GN Docket No. 23-135; ICFS File No. SAT-MOD-20230207-00021 (Sept. 29, 2023); Letter from Jameson Dempsey to Marlene H. Dortch, GN Docket No. 23-135; ICFS File No. SAT-MOD-20230207-00021; ULS File Nos. 0010303032, 0010303084, 0010303124, and 0010303146 (Nov. 14, 2023); Letter from David Goldman to Marlene H. Dortch, GN Docket No. 23-135; ICFS File No. SAT-MOD-20230207-00021; ULS File Nos. 0010303032, 0010303084, 0010303124, and 0010303146 (Nov. 24, 2023); Letter from Jameson Dempsey to Marlene H. Dortch, GN Docket No. 23-135; ICFS File No. SAT-MOD-20230207-00021 (Nov. 30, 2023).

<sup>5</sup> Omnispace Letter, Attachment A at 1 (D. Goldman of SpaceX (Apr. 7, 2024): "But if you are truly concerned about interference, good faith coordinate on behalf of our respective administrations would be a more productive path forward. That way we can learn more about Omnispace's actual operations and better understand your concerns.")

<sup>6</sup> Email from D. Goldman to I. Keltz and M. De La Torre (Apr. 3, 2024), attached hereto as Exhibit 1 ("We would also like to offer again to Omnispace that the parties begin coordination. While we understand that Omnispace was not ready to coordinate when we sought to start in December, coordination would give SpaceX an opportunity to better understand Omnispace's actual operations. With this understanding, we would be in a better position to address any concerns Omnispace may have.")

<sup>7</sup> Email from J. Cohen to A. Saluja (Dec. 15, 2023), attached hereto as Exhibit 2.

Marlene H. Dortch

April 12, 2024

Page 3 of 5

Sincerely,

*/s/ David Goldman*

David Goldman

Vice President of Satellite Policy

SPACE EXPLORATION TECHNOLOGIES CORP.

1155 F Street, NW

Suite 475

Washington, DC 20004

Tel: 202-649-2641

Email: [David.Goldman@spacex.com](mailto:David.Goldman@spacex.com)

Attachments

cc: Julie Kearney  
Whitney Lohmeyer  
Ira Keltz  
Merissa Velez  
Jeanine Poltronieri  
Mindel De La Torre  
Jennifer Manner

## **EXHIBIT 1**

**From:** [David Goldman](#)  
**To:** [Ira Keltz](#); [Mindel DeLaTorre](#); [Jameson Dempsey](#); [William Wiltshire](#)  
**Cc:** [Merissa Velez](#); [Jennifer Gilsean](#); [Ram Viswanathan](#); [Amit Saluja](#); [John Zukoski](#); [Julie Kearney](#); [Jayson Cohen](#); [Shea Boyd](#); [Whitney Lohmeyer](#); [Jeff Snyder](#)  
**Subject:** RE: [EXTERNAL]: Re: SpaceX coordination under conditional grant of test authority  
**Date:** Wednesday, April 3, 2024 4:32:03 PM

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Ira, thank you for your note and sorry for the delayed response. We plan to fully comply with the conditions on our authorizations.

While we continue to dispute Omnispace's characterization of itself as a potentially affected operator under the terms of the STA, as a courtesy we plan to provide the information set out in the condition in a separate email as we have done before.

We would also like to offer again to Omnispace that the parties begin coordination. While we understand that Omnispace was not ready to coordinate when we sought to start in December, coordination would give SpaceX an opportunity to better understand Omnispace's actual operations. With this understanding, we would be in a better position to address any concerns Omnispace may have.

Thanks,  
David

---

**From:** Ira Keltz <Ira.Keltz@fcc.gov>  
**Sent:** Tuesday, April 2, 2024 2:23 PM  
**To:** Mindel DeLaTorre <mdelatorre@omnispace.com>; David Goldman <David.Goldman@spacex.com>; Jameson Dempsey <Jameson.Dempsey@spacex.com>; William Wiltshire <WWiltshire@hwglaw.com>  
**Cc:** Merissa Velez <Merissa.Velez@fcc.gov>; Jennifer Gilsean <Jennifer.Gilsean@fcc.gov>; Ram Viswanathan <rv@omnispace.com>; Amit Saluja <asaluja@omnispace.com>; John Zukoski <jzukoski@omnispace.com>; Julie Kearney <Julie.Kearney@fcc.gov>; Jayson Cohen <Jayson.Cohen@spacex.com>; Shea Boyd <Shea.Boyd@spacex.com>; Whitney Lohmeyer <Whitney.Lohmeyer@fcc.gov>; Jeff Snyder <jsnyder@omnispace.com>  
**Subject:** RE: [EXTERNAL]: Re: SpaceX coordination under conditional grant of test authority

Mindel, et. al. – We are sending this e-mail as a reminder to all parties that Special Condition 6 on the FCC issued STA for testing Supplemental Downlink from Space requires that:

Prior to commencing any operations SpaceX must notify any potentially affected operators, including those with operations adjacent to the 1910-1915 MHz and 1990-1995 MHz bands. The notice must include the name and contact information of the stop buzzer personnel that will be available to cease operations in the event of reported interference. The notification should include the testing parameters (specific earth station location(s), antenna gain(s), EIRP, EIRP density) and day and times of each test.

Please let us know if you have any questions or want to discuss further.

Regards,  
Ira

---

**From:** Mindel DeLaTorre <[mdelatorre@omnispac.com](mailto:mdelatorre@omnispac.com)>  
**Sent:** Tuesday, April 2, 2024 11:59 AM  
**To:** David Goldman <[David.Goldman@spacex.com](mailto:David.Goldman@spacex.com)>; Jameson Dempsey <[Jameson.Dempsey@spacex.com](mailto:Jameson.Dempsey@spacex.com)>; William Wiltshire <[WWiltshire@hwglaw.com](mailto:WWiltshire@hwglaw.com)>  
**Cc:** Merissa Velez <[Merissa.Velez@fcc.gov](mailto:Merissa.Velez@fcc.gov)>; Jennifer Gilson <[Jennifer.Gilson@fcc.gov](mailto:Jennifer.Gilson@fcc.gov)>; Ram Viswanathan <[rv@omnispac.com](mailto:rv@omnispac.com)>; Amit Saluja <[asaluja@omnispac.com](mailto:asaluja@omnispac.com)>; John Zukoski <[jzukoski@omnispac.com](mailto:jzukoski@omnispac.com)>; Julie Kearney <[Julie.Kearney@fcc.gov](mailto:Julie.Kearney@fcc.gov)>; Jayson Cohen <[Jayson.Cohen@spacex.com](mailto:Jayson.Cohen@spacex.com)>; Shea Boyd <[Shea.Boyd@spacex.com](mailto:Shea.Boyd@spacex.com)>; Whitney Lohmeyer <[Whitney.Lohmeyer@fcc.gov](mailto:Whitney.Lohmeyer@fcc.gov)>; Ira Keltz <[Ira.Keltz@fcc.gov](mailto:Ira.Keltz@fcc.gov)>; Jeff Snyder <[jsnyder@omnispac.com](mailto:jsnyder@omnispac.com)>  
**Subject:** [EXTERNAL]: Re: SpaceX coordination under conditional grant of test authority

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Dear David,

I am contacting you because it appears that SpaceX is planning on launching another series of D2C satellites this week. As a potentially affected operator, Omnispace is requesting that prior to the launch, the information highlighted in yellow below be provided to us.

Thank you in advance and please let me know if you have any questions – Mindel

Mindel De La Torre  
Chief Regulatory and International Strategy Officer  
Omnispac LLC  
8255 Greensboro Drive, Suite 101  
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Office: +1.202.930.5935  
Mobile: +1.703.228.9697



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**From:** David Goldman <[David.Goldman@spacex.com](mailto:David.Goldman@spacex.com)>  
**Date:** Friday, February 9, 2024 at 6:24 PM  
**To:** Mindel DeLaTorre <[mdelatorre@omnispac.com](mailto:mdelatorre@omnispac.com)>, Jameson Dempsey

<[Jameson.Dempsey@spacex.com](mailto:Jameson.Dempsey@spacex.com)>, William Wiltshire <[WWiltshire@hwglaw.com](mailto:WWiltshire@hwglaw.com)>

**Cc:** "[merissa.velez@fcc.gov](mailto:merissa.velez@fcc.gov)" <[merissa.velez@fcc.gov](mailto:merissa.velez@fcc.gov)>, Jennifer Gilsenan <[Jennifer.Gilsenan@fcc.gov](mailto:Jennifer.Gilsenan@fcc.gov)>, Ram Viswanathan <[rv@omnispace.com](mailto:rv@omnispace.com)>, Amit Saluja <[asaluja@omnispace.com](mailto:asaluja@omnispace.com)>, John Zukoski <[jzukoski@omnispace.com](mailto:jzukoski@omnispace.com)>, Julie Kearney <[Julie.Kearney@fcc.gov](mailto:Julie.Kearney@fcc.gov)>, Jayson Cohen <[Jayson.Cohen@spacex.com](mailto:Jayson.Cohen@spacex.com)>, Shea Boyd <[Shea.Boyd@spacex.com](mailto:Shea.Boyd@spacex.com)>, Whitney Lohmeyer <[Whitney.Lohmeyer@fcc.gov](mailto:Whitney.Lohmeyer@fcc.gov)>, "[ira.keltz@fcc.gov](mailto:ira.keltz@fcc.gov)" <[ira.keltz@fcc.gov](mailto:ira.keltz@fcc.gov)>

**Subject:** RE: SpaceX coordination under conditional grant of test authority

Some people who received this message don't often get email from [david.goldman@spacex.com](mailto:david.goldman@spacex.com). [Learn why this is important](#)

Hi Mindel,

Thanks for your email. We are reviewing your requests.

Have a great weekend.

---

**From:** Mindel DeLaTorre <[mdelatorre@omnispace.com](mailto:mdelatorre@omnispace.com)>

**Sent:** Friday, February 9, 2024 4:54 PM

**To:** Jameson Dempsey <[Jameson.Dempsey@spacex.com](mailto:Jameson.Dempsey@spacex.com)>; William Wiltshire <[WWiltshire@hwglaw.com](mailto:WWiltshire@hwglaw.com)>; David Goldman <[David.Goldman@spacex.com](mailto:David.Goldman@spacex.com)>

**Cc:** [merissa.velez@fcc.gov](mailto:merissa.velez@fcc.gov); Jennifer Gilsenan <[Jennifer.Gilsenan@fcc.gov](mailto:Jennifer.Gilsenan@fcc.gov)>; Ram Viswanathan <[rv@omnispace.com](mailto:rv@omnispace.com)>; Amit Saluja <[asaluja@omnispace.com](mailto:asaluja@omnispace.com)>; John Zukoski <[jzukoski@omnispace.com](mailto:jzukoski@omnispace.com)>; Julie Kearney <[Julie.Kearney@fcc.gov](mailto:Julie.Kearney@fcc.gov)>; Jayson Cohen <[Jayson.Cohen@spacex.com](mailto:Jayson.Cohen@spacex.com)>; Shea Boyd <[Shea.Boyd@spacex.com](mailto:Shea.Boyd@spacex.com)>; Whitney Lohmeyer <[Whitney.Lohmeyer@fcc.gov](mailto:Whitney.Lohmeyer@fcc.gov)>; [ira.keltz@fcc.gov](mailto:ira.keltz@fcc.gov)

**Subject:** Re: SpaceX coordination under conditional grant of test authority

To: David Goldman, Space Exploration Holdings, LLC  
Jameson Dempsey, Space Exploration Holdings, LLC  
William Wiltshire, HWG LLP

On December 3, 2023, I notified you that Omnispace LLC is a potentially affected operator under Condition 4 of the Federal Communications Commission's conditional grant of ten-day test authority for Space Exploration Holdings, LLC's S3069 satellite authorization. See ICFS File No. SAT-MOD-20230207-00021 (Dec. 1, 2023). (Please see below for email text.)

On December 14, 2023, the FCC issued an Experimental Special Temporary Authorization (File No. 2398-EX-ST-2023) that included the following condition:

(6) **Prior to commencing any operations, SpaceX must notify any potentially affected operators, including those with operations adjacent to the 1910-1915 MHz and 1990-1995 MHz bands. The notice must include the name and contact information of the stop buzzer personnel that will be available to cease operations in the event of reported interference. The notification should include the testing parameters (specific earth station location(s),**

antenna gain(s), EIRP, EIRP density) and day and times of each test.

On that same day, December 14, I received an email from Bill Wiltshire with some information required under condition (6) of Experimental STA and another email on January 2, 2024, when the satellites were actually launched. While we appreciate the information that Bill Wiltshire provided, more specific information for each test is necessary to conduct a full interference risk analysis. Therefore, for future launches and testing windows for SpaceX SCS operations, Omnispace kindly requests the following additional information:

- the Norad satellite catalog identification number for each satellite involved in the testing,
- daily test times and durations of the transmissions from each identified satellite,
- frequencies to be utilized by each satellite,
- waveform to be used (bandwidth and 7-character emission designator),
- ground test locations including user equipment locations for testing, and
- satellite antenna maximum gain in dBi and total transmit power in dBW into the antenna on a per illuminated spotbeam basis and the number of simultaneously operating spot beams for each satellite.

Feel free to contact me with any questions.

Best regards,

Mindel

Mindel De La Torre  
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Omnispace LLC  
8255 Greensboro Drive, Suite 101  
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Office: +1.202.930.5935  
Mobile: +1.703.228.9697



---

**From:** Jameson Dempsey <[Jameson.Dempsey@spacex.com](mailto:Jameson.Dempsey@spacex.com)>

**Date:** Wednesday, December 6, 2023 at 4:56 AM

**To:** Mindel DeLaTorre <[mdelatorre@omnispace.com](mailto:mdelatorre@omnispace.com)>, William Wiltshire <[WWiltshire@hwglaw.com](mailto:WWiltshire@hwglaw.com)>, David Goldman <[David.Goldman@spacex.com](mailto:David.Goldman@spacex.com)>

**Cc:** "[merissa.velez@fcc.gov](mailto:merissa.velez@fcc.gov)" <[merissa.velez@fcc.gov](mailto:merissa.velez@fcc.gov)>, Jennifer Gilsenan <[Jennifer.Gilsenan@fcc.gov](mailto:Jennifer.Gilsenan@fcc.gov)>, Ram Viswanathan <[rv@omnispace.com](mailto:rv@omnispace.com)>, Amit Saluja <[asaluja@omnispace.com](mailto:asaluja@omnispace.com)>, John Zukoski <[jzukoski@omnispace.com](mailto:jzukoski@omnispace.com)>, Julie Kearney <[Julie.Kearney@fcc.gov](mailto:Julie.Kearney@fcc.gov)>, Jayson Cohen <[Jayson.Cohen@spacex.com](mailto:Jayson.Cohen@spacex.com)>, Shea Boyd



<[Shea.Boyd@spacex.com](mailto:Shea.Boyd@spacex.com)>

**Subject:** RE: SpaceX coordination under conditional grant of test authority

Some people who received this message don't often get email from [jameson.dempsey@spacex.com](mailto:jameson.dempsey@spacex.com). [Learn why this is important](#)

Mindel,

Thank you for your message. Following up on our in person conversation at WRC on Monday: we are in receipt of your request and our coordination team will reach out to you and John separately.

Best,  
Jameson

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**From:** Mindel DeLaTorre <[mdelatorre@omnispace.com](mailto:mdelatorre@omnispace.com)>

**Sent:** Sunday, December 3, 2023 10:50 AM

**To:** William Wiltshire <[WWiltshire@hwglaw.com](mailto:WWiltshire@hwglaw.com)>; David Goldman <[David.Goldman@spacex.com](mailto:David.Goldman@spacex.com)>; Jameson Dempsey <[Jameson.Dempsey@spacex.com](mailto:Jameson.Dempsey@spacex.com)>

**Cc:** [merissa.velez@fcc.gov](mailto:merissa.velez@fcc.gov); Jennifer Gilsenan <[Jennifer.Gilsenan@fcc.gov](mailto:Jennifer.Gilsenan@fcc.gov)>; Ram Viswanathan <[rv@omnispace.com](mailto:rv@omnispace.com)>; Amit Saluja <[asaluja@omnispace.com](mailto:asaluja@omnispace.com)>; John Zukoski <[jzukoski@omnispace.com](mailto:jzukoski@omnispace.com)>; Julie Kearney <[Julie.Kearney@fcc.gov](mailto:Julie.Kearney@fcc.gov)>

**Subject:** SpaceX coordination under conditional grant of test authority

To: David Goldman, Space Exploration Holdings, LLC  
Jameson Dempsey, Space Exploration Holdings, LLC  
William Wiltshire, HWG LLP

This is to notify you that Omnispace LLC is a potentially affected operator under Condition 4 of the Federal Communications Commission's conditional grant of ten-day test authority for Space Exploration Holdings, LLC's S3069 satellite authorization. See ICFS File No. SAT-MOD-20230207-00021 (Dec. 1, 2023). As a potentially affected operator, Omnispace anticipates SpaceX will seek coordination prior to use of frequencies within the 1910-1915 MHz and 1990-1995 MHz bands for purposes of limited on-orbit checkout with authorized earth station(s) in the United States.

Please direct SpaceX's coordination request to John Zukoski (Vice President for Satellite Engineering at Omnispace) at [jzukoski@omnispace.com](mailto:jzukoski@omnispace.com) and to me at [mdelatorre@omnispace.com](mailto:mdelatorre@omnispace.com). Pursuant to Condition 4, please also provide the dates of testing prior to commencing operations as well as a stop-buzzer point of contact to ensure the immediate cessation of operations should interference with Omnispace's licensed operations occur.

Feel free to contact me with any questions.

Sincerely,

Mindel De La Torre  
Chief Regulatory and International Strategy Officer

Omnispace LLC  
8255 Greensboro Drive, Suite 101  
McLean, VA 22102 USA  
Office: +1.202.930.5935  
Mobile: +1.703.228.9697



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## **EXHIBIT 2**

**From:** [Jayson Cohen](#)  
**To:** [Amit Saluja](#)  
**Cc:** [Ron Olexa](#); [Brian Schepis](#); [John Zukoski](#); [Mindel DeLaTorre](#); [Rob Fisher](#)  
**Subject:** RE: Omnispace/SpaceX Coordination

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Dear Amit,

Thank you for your patience. As I said we would, SpaceX has considered what Omnispace said at Tuesday's meeting, and how it explained its request for information. We have also now considered your proposed revisions to the NDA in view of that discussion and the FCC's recent authorizations, as reflected below.

At Tuesday's meeting, I opened the conversation stating our willingness to coordinate with Omnispace under SpaceX's coordination-specific NDA, which we had provided. I explained that Brian and I are members of SpaceX's coordination team, which is why we were the ones talking to you. Relevant to coordination, I mentioned that SpaceX had submitted a showing to the FCC to demonstrate that even if SpaceX deploys its entire direct-to-cellular system, it will not interfere with Omnispace.

To our surprise, Omnispace's CTO Mr. Snyder was unequivocal that Omnispace did not want to coordinate, but rather sought certain highly sensitive, non-public information to monitor its system for interference during our on-orbit tests. He was also unequivocal that Omnispace found our coordination-specific NDA unacceptable for these discussions and that he didn't want "coordination" even mentioned in the NDA. In response, I said that SpaceX's view is that the requested information is not necessary for Omnispace to monitor its own systems for interference given the information about our testing that is publicly available.

Omnispace's NDA revisions, which remove all but one reference to coordination (itself a recitation of the language in SpaceX's December 1 grant), further confirm that Omnispace does not seek to coordinate its satellite operations with SpaceX.

The parties also did not discuss at Tuesday's meeting, and Omnispace did not mention then, Omnispace's position that it is a "potentially-affected operator" under SpaceX's FCC grant, a position that SpaceX disputed last week in a separate email chain. Yet Omnispace is now asking SpaceX to agree with Omnispace's position affirmatively in its revisions to the NDA. Even if SpaceX agreed with Omnispace's position on this issue, which it does not, that would only trigger a coordination obligation and the notice provisions in the FCC's more recent December 14 authorizations. But as discussed above, Omnispace told us Tuesday it does not want to coordinate. And as a courtesy, SpaceX has already provided Omnispace with the information listed in the notice provisions of SpaceX's authorizations.

To the extent that the information Omnispace has requested from SpaceX goes beyond the FCC's notice provisions in SpaceX's authorizations, that non-public information is highly sensitive and moreover is not required for coordination. In addition, the FCC has made a clear distinction between coordination and the information specified in the notice provisions of SpaceX's authorizations.

To be frank, Omnispace's information demands and the series of events since last week, including refusing to sign our standard coordination NDA, are both perplexing and concerning. Last week, Omnispace suggested the parties should coordinate, and we agreed to do so notwithstanding our view that the condition of the December 1 grant does not apply to Omnispace. Tuesday, Omnispace claimed it does not want to coordinate with SpaceX; it wants the non-public information for another purpose. Then, Omnispace confirmed through its revisions to the NDA that it does not want to coordinate and rather seeks to receive highly sensitive non-public information from SpaceX and also to share it unilaterally without SpaceX's consent, cloaked in the language of the condition language in SpaceX's authorization.

Here is where we are. First, the FCC's December 14 notice provisions have rendered moot Omnispace's request for additional highly sensitive information. Second, SpaceX remains willing and ready to coordinate our on-orbit test system under SpaceX's coordination-specific NDA and exchange information necessary to coordinate as that term is understood among satellite operators, independent of any condition language in our grants. Under that NDA, we can discuss what information the parties need to exchange beyond the publicly available information, if any, to perform interference analysis for coordination purposes. Please let us know if this is acceptable to Omnispace.

Best regards,  
Jayson

---

**From:** Jayson Cohen  
**Sent:** Thursday, December 14, 2023 11:53 AM  
**To:** 'Amit Saluja' <asaluja@omnispace.com>  
**Cc:** Ron Olexa <rolexa@omnispace.com>; Brian Schepis <Brian.Schepis@spacex.com>; John Zukoski <jzukoski@omnispace.com>; Mindel DeLaTorre <mdelatorre@omnispace.com>; Rob Fisher <rfisher@omnispace.com>  
**Subject:** RE: Omnispace/SpaceX Coordination

Dear Amit,

Thanks for following up, and nice to meet you too on Tuesday. We are still reviewing.

Best regards,  
Jayson

---

**From:** Amit Saluja <[asaluja@omnispace.com](mailto:asaluja@omnispace.com)>  
**Sent:** Thursday, December 14, 2023 9:24 AM  
**To:** Jayson Cohen <[Jayson.Cohen@spacex.com](mailto:Jayson.Cohen@spacex.com)>  
**Cc:** Ron Olexa <[rolexa@omnispace.com](mailto:rolexa@omnispace.com)>; Brian Schepis <[Brian.Schepis@spacex.com](mailto:Brian.Schepis@spacex.com)>; John Zukoski <[jzukoski@omnispace.com](mailto:jzukoski@omnispace.com)>; Mindel DeLaTorre <[mdelatorre@omnispace.com](mailto:mdelatorre@omnispace.com)>; Rob Fisher <[rfisher@omnispace.com](mailto:rfisher@omnispace.com)>  
**Subject:** Re: Omnispace/SpaceX Coordination

Jayson - just following up on the below.

Thanks.

Amit

On Dec 13, 2023, at 7:46 AM, Amit Saluja <[asaluja@omnispace.com](mailto:asaluja@omnispace.com)> wrote:

Jayson and Brian – Nice meeting both of view virtually yesterday. As discussed, attached is our proposed revised NDA consistent with our discussion and utilizing the form of SpaceX NDA for ease of review (.pdf of the blackline and clean word copy). If these are acceptable to you, we can sign the clean copy and send back. If you would like to discuss – please let us know.

Best,

Amit

**Amit Saluja**

Chief Business Officer & General Counsel  
Omnispace, LLC  
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McLean, VA 22102  
o +1.202.930.5952  
m +1.703.587.6544  
e [asaluja@omnispace.com](mailto:asaluja@omnispace.com)  
[www.omnispace.com](http://www.omnispace.com)

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**From:** Jayson Cohen <[Jayson.Cohen@spacex.com](mailto:Jayson.Cohen@spacex.com)>

**Date:** Monday, December 11, 2023 at 9:51 PM

**To:** John Zukoski <[jzukoski@omnispace.com](mailto:jzukoski@omnispace.com)>, Mindel DeLaTorre  
<[mdelatorre@omnispace.com](mailto:mdelatorre@omnispace.com)>

**Cc:** Ron Olexa <[rolexa@omnispace.com](mailto:rolexa@omnispace.com)>, Amit Saluja <[asaluja@omnispace.com](mailto:asaluja@omnispace.com)>, Brian Schepis <[Brian.Schepis@spacex.com](mailto:Brian.Schepis@spacex.com)>

**Subject:** RE: Omnispace/SpaceX Coordination

Dear John,

Thanks for reaching out again. And please note that SpaceX prefers to keep a single email chain if possible when we coordinate. Therefore I have attached your last email

to the chain we had already started.

Although we understand Omnispace would like to exchange information before we meet initially tomorrow, I have a couple asks while I investigate the information you requested.

1. I have attached our coordination-specific mutual NDA template. Please enter Omnispace's information and sign so that the parties can exchange and freely discuss any information relating to coordination under NDA. I will add my signature and send back to you.
2. We can discuss your requests further tomorrow under NDA.

For now, per our December 1, 2023 STA application, it is public information that the user locations for our tests will be in Mountain View, CA, and Redmond, WA.

Best regards,  
Jayson

Jayson Cohen  
Satellite Policy Director  
<image001.jpg>  
Mobile: +1 310-844-5650

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**From:** Jayson Cohen  
**Sent:** Monday, December 11, 2023 2:17 PM  
**To:** 'John Zukoski' <[jzukoski@omnispace.com](mailto:jzukoski@omnispace.com)>; Mindel DeLaTorre <[mdelatorre@omnispace.com](mailto:mdelatorre@omnispace.com)>  
**Subject:** RE: Omnispace/SpaceX Coordination

Dear John,

That works for me. I just got your Teams invite.

Best,  
Jayson

Jayson Cohen  
Satellite Policy Director  
<image001.jpg>  
Mobile: +1 310-844-5650

---

**From:** John Zukoski <[jzukoski@omnispace.com](mailto:jzukoski@omnispace.com)>  
**Sent:** Monday, December 11, 2023 1:22 PM  
**To:** Jayson Cohen <[Jayson.Cohen@spacex.com](mailto:Jayson.Cohen@spacex.com)>; Mindel DeLaTorre <[mdelatorre@omnispace.com](mailto:mdelatorre@omnispace.com)>  
**Subject:** RE: Omnispace/SpaceX Coordination

Jayson –

Mindel and I are available tomorrow Tue Dec 12 @ 11:30 am ET time for an initial coordination meeting. Does that time work for you? Let me know and I can send out a Teams meeting notice.

Regards –

**John Zukoski**  
*VP, Satellite Engineering and Operations*  
*Omnispace LLC*  
*m +1 (949) 292-7325*  
*e [jzukoski@omnispace.com](mailto:jzukoski@omnispace.com)*  
*[www.omnispace.com](http://www.omnispace.com)*

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**From:** Jayson Cohen <[Jayson.Cohen@spacex.com](mailto:Jayson.Cohen@spacex.com)>  
**Sent:** Friday, December 8, 2023 05:26 AM  
**To:** Mindel DeLaTorre <[mdelatorre@omnispace.com](mailto:mdelatorre@omnispace.com)>  
**Cc:** John Zukoski <[jzukoski@omnispace.com](mailto:jzukoski@omnispace.com)>  
**Subject:** Re: Omnispace/SpaceX Coordination

Hi Mindel,

I'm on the East Coast. I have good flexibility on Monday and Tuesday right now if that works for you and John.

Thanks.

Best,  
Jayson

On Dec 8, 2023, at 2:31 AM, Mindel DeLaTorre  
<[mdelatorre@omnispace.com](mailto:mdelatorre@omnispace.com)> wrote:

Hi, Jayson and John,

As John mentioned, I am in Dubai and as the SpaceX team that is here knows very well, this is the crazy time that we are all working until the wee hours -- 1:45 AM last night (this AM) -- so I would prefer to have the



meeting next week, especially since we are +9 hours from EST and +12 hours from PST.

Jayson – what time zone are you on?

Take care – Mindel

Mindel De La Torre  
Chief Regulatory and International Strategy Officer  
Omnispace LLC  
8255 Greensboro Drive, Suite 101  
McLean, VA 22102 USA  
Office: +1.202.930.5935  
Mobile: +1.703.228.9697



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**From:** John Zukoski <[jzukoski@omnispace.com](mailto:jzukoski@omnispace.com)>  
**Date:** Friday, December 8, 2023 at 4:55 AM  
**To:** Jayson Cohen <[Jayson.Cohen@spacex.com](mailto:Jayson.Cohen@spacex.com)>, Mindel DeLaTorre <[mdelatorre@omnispace.com](mailto:mdelatorre@omnispace.com)>  
**Subject:** RE: Omnispace/SpaceX Coordination

Jayson –

Nice to meet you as well, and I am confirming that I received your email. Mindel is in Dubai for the WRC-23 conference. Let me coordinate internally with her on her availability, and then we can setup a meeting for an initial discussion.

Regards –

John Zukoski  
*VP, Satellite Engineering and Operations*  
Omnispace LLC  
e [jzukoski@omnispace.com](mailto:jzukoski@omnispace.com)  
[www.omnispace.com](http://www.omnispace.com)

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**From:** Jayson Cohen <[Jayson.Cohen@spacex.com](mailto:Jayson.Cohen@spacex.com)>  
**Sent:** Thursday, December 7, 2023 12:40 PM  
**To:** Mindel DeLaTorre <[mdelatorre@omnispace.com](mailto:mdelatorre@omnispace.com)>; John Zukoski <[jzukoski@omnispace.com](mailto:jzukoski@omnispace.com)>

**Subject:** Omnispace/SpaceX Coordination

Some people who received this message don't often get email from [jayson.cohen@spacex.com](mailto:jayson.cohen@spacex.com). [Learn why this is important](#)

Dear Mindel and John,

Nice to meet you. I will be the main point of contact for coordination with Omnispace. Please let me know your availability tomorrow (Friday) to have an initial discussion.

Thanks!

Best Regards,  
Jayson

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<Blackline - Omni-SpaceX NDA (Omni Comments 12.12.23)[89].pdf>  
<SpaceX - Omni NDA (Clean).docx>

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