



May 23, 2024

BY ELECTRONIC FILING

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

Re: *ELS File No. 0519-EX-ST-2024 (call sign WW9XPI); GN Docket No. 23-65;
IB Docket No. 22-271*

Dear Ms. Dortch:

Omnispace's recent letter does not show that SpaceX's direct-to-cellular experimental testing caused harmful interference in the two limited tests OmnispaceX conducted.¹ Instead, Omnispace has merely demonstrated its ability to intentionally configure its lone MEO satellite to detect SpaceX's direct-to-cell emissions. This only proves that SpaceX's direct-to-cell satellites were operating at the time of Omnispace's tests and detectable under the narrow conditions of those tests, not that SpaceX's emissions are causing or would cause harmful interference to Omnispace.

Omnispace does not provide the specificity that is the hallmark of an actual operator truly trying to resolve actual interference. Nowhere does Omnispace demonstrate that its test configuration is consistent with operating parameters Omnispace would use if providing Mobile-Satellite Service, and Omnispace does not claim—or provide evidence to suggest—that SpaceX's tests have harmfully interfered with any Omnispace service. Nor does Omnispace's analysis include other information necessary to evaluate Omnispace's assertions of harmful interference, such as antenna parameters, service territories, specific satellite locations, and the regularity and duration of any supposed exceedances. Tellingly, the two instances Omnispace cites represent just 0.02% of the satellite passes that SpaceX has conducted in its experimental testing over the past five months.

SpaceX has successfully coordinated in good faith with other operators around the world to reach efficient spectrum sharing solutions that maximize the benefit of satellite communications for people on the ground. In that spirit, SpaceX has repeatedly requested over the last six months to coordinate its U.S. direct-to-cellular operations in the PCS G Block with Omnispace's S-band operations licensed through Papua New Guinea. Through such coordination both parties could share their actual operating parameters and develop strategies to mitigate any substantiated claims of harmful interference to service. Unfortunately, Omnispace has never explained why it believes it is exempt from requirements to share information through coordination, choosing instead to refuse or ignore each of SpaceX's requests to coordinate. If Omnispace were genuinely concerned

¹ Letter from Mindel De La Torre to Marlene H. Dortch, GN Docket No. 23-65, IB Docket No. 22-271, ELS File Nos. 2479-EX-ST-2023, 0519-EX-ST-2024, and 0661-EX-ST-2024 (May 17, 2024).

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about harmful interference to its operations, it could always take up SpaceX on its offer to work in good faith toward a solution, to the extent one is necessary. SpaceX continues to stand ready to engage in this coordination process as soon as Omnispace is willing to do so.

Sincerely,

/s/ David Goldman

David Goldman

Vice President of Satellite Policy

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