



May 31, 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, in an effort to justify its refusal to respond to SpaceX's many overtures to address any legitimate interference concerns Omnispace may have, filed a strange letter loaded with bizarre analogies that does not even attempt to substantiate its claim of interference. Omnispace claims it refuses to respond to any of SpaceX's good faith offers to resolve any interference concerns because Omnispace now believes that ITU regulations do not require it to do so.¹

Yet just last month, Omnispace was the party that argued that "SpaceX's failure to coordinate with Omnispace or to respond in a meaningful manner to Omnispace's requests is also contrary to law and policy."² Omnispace went even further by claiming the Commission—the agency whose oversight Omnispace chose to evade when it licensed through Papua New Guinea—"does not tolerate failures to coordinate with potentially affected operators."³ While Omnispace may not be familiar with coordination (SpaceX has been unable to find evidence of Omnispace offering any service), that process typically requires the participation of two operators.

Omnispace's recent letter also uses an extended analogy about traffic lanes, seeming to claim that operators that use fewer frequencies cannot find technical solutions to share spectrum.⁴ While Omnispace's point is not entirely clear, the number of frequencies involved has no relation to finding technical solutions to resolving interference.

SpaceX continues to stand ready to work with Omnispace in the event Omnispace chooses to make any serious effort to substantiate or resolve its claims.

¹ See Letter from Mindel De La Torre to Marlene H. Dortch, ELS File No. 0519-EX-ST-2024 (call sign WW9XPI); GN Docket No. 23-65; IB Docket No. 22-271 (May 30, 2024) ("Omnispace May 30 Letter").

² Letter from Mindel De La Torre to Marlene H. Dortch, Call Sign WW9XPI; DA No. 24-280, at 1 (Apr. 9, 2024)

³ *Id.* at 2.

⁴ Omnispace May 30 Letter at 2-3.

Marlene H. Dortch

May 31, 2024

Page 2 of 2

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