



November 19, 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)*

Dear Ms. Dortch:

Pursuant to Special Condition 17 of its experimental authorization, SpaceX is pleased to report that its tests of the batch of direct-to-cellular satellites launched on September 20, 2024 have met or exceeded all testing objectives, demonstrating that the system remains on track to offer commercial service in the United States later this year.

As SpaceX stated in its request for experimental special temporary authority, it anticipates continuing to test the performance of these satellites at lower altitudes, where atmospheric drag on the vehicle is at its highest and passive decay will take a matter of weeks. In addition to the benefits for space sustainability from operating at these lower altitudes, these operations also improve service for consumers by lowering latency and improving link budget while remaining within authorized power flux-density (“PFD”) limits. SpaceX will continue to test at these lower altitudes to further validate its performance expectations for lower altitude shells within its ITU filing.

Testing has met or exceeded expectations. As with SpaceX’s previous reports, during the test period SpaceX conducted initial on-orbit checkout testing, link budget verification, and tests of satellite beam pointing, beam placement, device connection, emissions levels, and topology software. SpaceX also conducted user equipment tests in the testing areas authorized in its experimental STA. Tests of unmodified commercial devices have occurred in urban and rural environments, with a variety of foliage conditions, from clear sky to oak-tree-filled valleys. These tests have validated the ability of SpaceX’s direct-to-cellular system to conduct SMS text messaging and—using X and WhatsApp—direct messaging, audio calling, video calling, and photo and video file exchange. Testing has been limited to non-commercial operations in the PCS G Block—i.e., 1910-1915 MHz (Earth-to-space) and 1990-1995 MHz (space-to-Earth)—with the consent of T-Mobile.

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Should you have any questions, please direct them to me.

Sincerely,

*/s/ Jameson Dempsey*

Jameson Dempsey  
Director, Satellite Policy

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