

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

|                                       |   |                        |
|---------------------------------------|---|------------------------|
| In the Matter of                      | ) |                        |
|                                       | ) |                        |
| Space Exploration Holdings, LLC       | ) | IBFS File Nos.         |
| Amendment to Pending Application for  | ) | SAT-LOA-20200526-00055 |
| the SpaceX Gen2 NGSO Satellite System | ) | SAT-AMD-20210818-00105 |

**REQUEST FOR EXTENSION OF COMMENT DEADLINE**

Kuiper Systems LLC, a wholly owned subsidiary of Amazon.com Services LLC (collectively “Amazon”), respectfully requests a 30-day extension of the deadline for filing pleadings in response to the Public Notice<sup>1</sup> that accepts for filing the above-captioned application and amendment proposed by Space Exploration Holdings, LLC (“SpaceX”) for its next-generation non-geostationary orbit satellite system (the “Gen2 System”).<sup>2</sup> Good cause exists to grant the extension request, which will allow for a more thorough analysis and response.

“[T]he technical complexity of issues” warrants “extending the [filing] deadlines to ensure a more fully developed record.”<sup>3</sup> The application itself seeks authority to deploy 30,000 satellites, and evaluating a constellation of this unprecedented scale will involve complex and novel issues. Further, the FCC sought clarification on several aspects of the SpaceX amendment, including the relationship between the Gen2 System and SpaceX’s first-generation system, the applicability of Section 25.159 of the Commission’s rules, minimum elevation angle, launch plans, deployment

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<sup>1</sup> See Public Notice, Report No. SAT-01598 (Dec. 23, 2021); *see also* 47 C.F.R. § 25.154(a).

<sup>2</sup> See Space Exploration Holdings, LLC, Amendment to Pending Application for the SpaceX Gen2 NGSO Satellite System, IBFS File No. SAT-AMD-20210818-00105 (filed Aug. 18, 2021) (“*SpaceX Amendment*”); IBFS File No. SAT-LOA-20200526-00055.

<sup>3</sup> *Allocation of Spectrum for Non-Federal Space Launch Operations*, Order, DA 21-788, ¶ 4 (OET July 7, 2021).

altitude, expected reliability, and in-orbit lifetime.<sup>4</sup> SpaceX’s January 7 response to these questions raises a number of issues that call for analysis and a potential response, and Amazon and other parties will need adequate time to review and analyze SpaceX’s responses to allow for a more “complete discussion of the matters pending before the Commission.”<sup>5</sup> Finally, an extension is necessary to ensure that parties have a meaningful opportunity to prepare and file comments, especially as the comment period includes three Federal holidays, which the FCC has recognized “effectively shortens[] the normal time for filing comments.”<sup>6</sup>

For the foregoing reasons, a 30-day extension of time to file responsive pleadings would serve the public interest and help ensure the development and submission of a more thorough and meaningful record for the Commission to consider.

Respectfully submitted,

/s/ C. Andrew Keisner

C. Andrew Keisner  
Lead Counsel  
Kuiper Systems LLC,  
an Amazon subsidiary

Dated: January 10, 2022

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<sup>4</sup> See Letter from Karl Kensinger, Chief, Satellite Division, International Bureau, to Mr. William Wiltshire, Counsel for SpaceX, IBFS File Nos. SAT-LOA-20200526-00055, SAT-AMD-20210818-00105 (Dec. 23, 2021).

<sup>5</sup> *Commission Staff Requests that Interested Parties Supplement the Record on Draft Interference Rules for Wireless Communications Service and Satellite Digital Audio Radio Service*, Order Extending Comment Period, 25 FCC Rcd 3642 (OET 2010); see also *Expanding Flexible Use of the 12.2-12.7 GHz Band, et al.*, Order, 36 FCC Rcd 6534 (WTB 2021) (extending deadlines for comments and reply comments where “authorizing additional time potentially will allow all interested parties to more fully develop their responses to the Commission’s [Notice of Proposed Rulemaking]...”).

<sup>6</sup> See *Advanced Methods to Target and Eliminate Unlawful Robocalls*, Order, DA 21-1395, ¶ 5 (WCB CGB Nov. 5, 2021).

**CERTIFICATE OF SERVICE**

I hereby certify that, on this 10th day of January 2022, a copy of the foregoing Request for Extension was served upon:

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/s/ Leslie Gray  
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