

January 5, 2026

BY ELECTRONIC FILING

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
45 L Street, NE
Washington, DC 20554

Re: Application of Space Exploration Holdings, LLC to Launch and Operate the SpaceX NGSO MSS System, ICFS File Nos. SAT-LOA-20250916-00282 and SAT-AMD-20251125-00339, GN Docket No. 25-340

Dear Ms. Dortch:

The Mobile Satellite Services Association (“MSSA”) writes to express serious concerns with respect to the above-referenced application in which SpaceX proposes to operate a *third* nongeostationary orbit (“NGSO”) satellite system consisting of 15,000 *additional* satellites in low-Earth orbit (“LEO”). SpaceX proposes to operate these satellites in the 2 GHz MSS band within the United States, and across the broader 1429-2690 MHz band outside of the United States, to support mobile-satellite service (“MSS”) and supplemental coverage from space (“SCS”) operations.

MSSA is a non-profit industry association founded in 2024 that seeks to promote and advance the emerging ecosystem for advanced Non-Terrestrial Network (“NTN”) services, including direct-to-device (“D2D”). MSSA supports the efforts of advanced NTN solutions providers, including terrestrial mobile and satellite operators, original equipment manufacturers, infrastructure providers, chip vendors, and others. MSSA is focused on facilitating a global ecosystem utilizing spectrum already allocated and licensed for mobile satellite services (“MSS”) and well-suited for integration into a broad range of mobile devices. More specifically, MSSA seeks to facilitate global mobile connectivity via satellite through open, standards-based solutions. More information about MSSA is available at www.MSSAssociation.org.

MSS operators—including but not limited to MSSA members—are already utilizing spectrum resources in the 1429-2690 MHz band to support a variety of critical connectivity applications (including for safety-of-life, emergency response, and national security). These same operators are actively seeking to leverage cutting-edge technologies to bring innovative services to the public—and are investing billions of

dollars to do so. Accordingly, and as MSSA has explained previously, the MSS portions of the 1429-2690 MHz band are generally unavailable for new applicants.

Moreover, SpaceX makes absolutely no effort to demonstrate that it would be able to operate without causing harmful interference to existing and planned MSS operations. This is highly problematic given the nature of SpaceX's proposal, which poses seemingly insurmountable interference risks. Indeed, as the Commission has noted, it is prohibitively difficult for multiple MSS networks to operate on an overlapping, co-frequency basis without causing harmful interference to each other.¹ SpaceX has had every opportunity to demonstrate that it can somehow defy these basic physics and engineering principles but has failed to do so.

MSSA appreciates the Commission's efforts to advance the interests of the satellite industry. That said, SpaceX's proposed operations would almost certainly undermine existing and planned MSS operations. SpaceX's application should be denied on that basis.

Respectfully submitted,

/s/

Michele Lawrie-Munro
MSSA Executive Director
Mobile Satellite Services Association
5000 Executive Parkway, Suite 302
San Ramon, CA 94583
(925) 275-6673

¹ See, e.g., *Amendment of Part 2 of the Commission's Rules for Federal Earth Stations with Non-Federal Satellite Service Space Stations*, 28 FCC Rcd 6698, ¶ 13 n.25 (2013) (noting that MSS earth stations "often use omni-directional antennas on portable devices which makes it extremely difficult to avoid causing interference to other satellites sharing the same spectrum.").