

April 4, 2025

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, ICFS File Nos. SAT-MOD-20241011-00224; SAT-AMD-20241017-00228; SAT-MOD-20230207-00021 and SAT-AMD-20240322-00061, *et al.*

Dear Ms. Dortch:

The Mobile Satellite Services Association (“MSSA”) writes to correct the record to address SpaceX’s mischaracterization of the MSSA and its mission.

MSSA is a non-profit industry association that seeks to promote and advance the emerging D2D ecosystem and support the efforts of D2D solutions providers—including terrestrial mobile and satellite operators, OEMs, infrastructure, chip vendors, and others. MSSA is focused on facilitating a global ecosystem utilizing spectrum already allocated and licensed for Mobile Satellite Service (“MSS”) and well-suited for integration into a broad range of mobile devices. D2D services will play a critical role in expanding connectivity and enabling competition across multiple large and diverse segments. As such, MSSA and its members will continue to closely monitor the Commission’s ongoing D2D related activities and make sure to share valuable perspective to leverage the benefits and achievements of licensed MSS spectrum.

MSSA is comprised of many companies that contribute to the D2D ecosystem.¹ Among MSSA’s chief goals are to:

- (i) Support open interoperable architectures and standards for use in multi-orbit satellite systems, ground infrastructure, and end user equipment;

¹ See <https://www.mss-association.org/about-mssa/#members>

- (ii) Define specifications, best practices, reference architectures, implementation guidelines and standardized agreements to promote the adoption of satellite-to-terrestrial mobile telecommunication services and enhance seamless global roaming between terrestrial and multi-orbit satellite networks;
- (iii) Achieve scale through improved coordination and cooperation mechanisms among MSS operators to maximize the utility of already available and licensed global MSS spectrum in nations desiring advanced NTN services;
- (iv) Maximize scarce multi-orbit space and spectrum resources and employ sustainable network design and operation to enable affordable advanced NTN services; and
- (v) Advocate for policies, laws and regulations that advance the purposes of the Association, including those related to rational, efficient, safe and sustainable uses of spectrum and orbits, and based on, where appropriate, objective and quantitative metrics regarding all objects in orbit around Earth.

These objectives and MSSA's activities in furtherance of them, including MSSA's advocacy in this particular proceeding and before the FCC generally, benefit the entire industry, and not just MSSA's members.

MSSA appreciates the Commission's efforts to advance the interests of the satellite industry generally and D2D connectivity specifically. MSSA looks forward to working with the Commission on further developing a regulatory environment for the space economy that works in the public interest.

Respectfully submitted,

/s/

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cc: David Goldman, SpaceX