



November 8, 2023

By Electronic Filing

The Honorable Jessica Rosenworcel
Chairwoman
Federal Communications Commission
45 L Street N.E.
Washington, D.C. 20554

Re: IB Docket No. 16-185

Dear Chairwoman Rosenworcel:

Kuiper Systems LLC, a wholly-owned subsidiary of Amazon.com Services LLC (“Amazon”), and Space Exploration Holdings, LLC (“SpaceX”) appreciate the Federal Communication Commission’s (“FCC” or “Commission”) sustained efforts to promote innovation and development among non-geostationary orbit (“NGSO”) fixed-satellite service (“FSS”) systems, as well as within the broader satellite industry. Domestically, the Commission has embraced the unprecedented growth and innovation in space with a series of reforms aimed at promoting this development. To continue U.S. leadership in space, the United States must also drive innovation internationally.

Consistent with these efforts, we applaud the FCC staff who led advocacy at the Inter-American Telecommunication Commission (“CITEL”) meeting in Ottawa, Canada on August 28-September 1, 2023, that resulted in an Inter-American Proposal for a World Radiocommunication Conference (“WRC”)-27 Future Agenda Item (“FAI”) to review and update the equivalent power flux-density (“epfd”) limits of Article 22 of the ITU Radio Regulations, while respecting protection needs for geostationary orbit (“GSO”) satellite networks. Article 22 epfd limits were provisionally adopted at WRC-97 and confirmed at WRC-2000—nearly a quarter century ago—to define acceptable interference from NGSO systems into GSO networks. These limits significantly impact and restrict the operation of NGSO systems. Rapid advancement of technology since then has rendered Article 22’s single entry and aggregate epfd limits outdated. Established decades ago against the backdrop of a far different commercial and technological environment, epfd limits now reflect technologies, protection criteria, and spectrum sharing philosophies far out of step with today’s satellite industry. The ability to connect customers and further meet the goals of bridging the digital divide requires regulations that support modern satellite technology. Updating Article 22 epfd limits is squarely in line with this objective.

Amazon and SpaceX urge the Commission to continue to support positions at WRC-23 that promote NGSO innovation and progress. In addition to the Inter-American Proposal supported by

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ten CITELE member states, multi-country proposals from Africa as well as the Asia Pacific region now support the epfd FAI. We look forward to working with the Commission at WRC-23 to grow the epfd FAI momentum and ask that the Commission prioritize the WRC-27 epfd FAI at WRC-23. By doing so, the Commission will exhibit American leadership on this important issue and further promote U.S. technology and innovation in the new space age.

Sincerely,

/s/ Julie Zoller
Head of Global Regulatory Affairs
Amazon Project Kuiper

/s/ David Goldman
Vice President, Satellite Policy
SpaceX