

March 17, 2021

Secretary
Pennsylvania PUC
Commonwealth Keystone Building - 2nd Floor
400 North Street
Harrisburg PA 17120

Via Electronic Filing

RE: *Starlink Services, LLC's Response to the Bureau of Consumer Services Data Requests in the Matter of Starlink Services, LLC Application for Designation as an Eligible Telecommunications Carrier for Purposes of Receiving Rural Digital Opportunities Fund Support, Docket No. P-2021-3023580*

Dear Secretary:

Starlink Services, LLC ("Starlink Services") includes herewith a response to Pennsylvania Bureau of Consumer Services Staff (the "Staff") Data Requests, issued by the Staff on January 28, 2021, in the matter of Starlink Services' application for designation as an eligible telecommunications carrier for purposes of receiving Rural Digital Opportunity Fund Support. Please direct any questions regarding this response to the undersigned.

Respectfully Submitted,

/s/ R. Edward Price

R. Edward Price

Senior Counsel

SPACE EXPLORATION TECHNOLOGIES CORP.

PARENT COMPANY OF STARLINK SERVICES, LLC

1155 F. Street, NW

Washington, D.C. 20004

Ted.Price@spacex.com

(585) 455-6672

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Application of Starlink Services, LLC for :
Designation as an Eligible Telecommunications : Docket No. P-2021-3023580
Carrier for Purposes of Receiving Rural Digital :
Opportunities Fund Support :
:

**RESPONSES OF STARLINK SERVICES, LLC TO THE BUREAU OF
CONSUMER SERVICES DATA REQUESTS**

1. **Describe how Starlink will structure staff assignments to assist low-income consumers. Or will the company outsource customer service, recordkeeping and other Lifeline-related activities? 47 CFR § 54.406.**

RESPONSE:

Starlink Services, LLC (“Starlink Services” or the “Company”) is still in the early stages of developing advertising material for the Lifeline Program and, as such, has not determined how it will structure staff assignments or whether it will outsource any Lifeline-related activities. The Company will ensure that Lifeline services are provided and that the necessary internal and third-party vendor resources are deployed so that Lifeline services will be available in accordance with the timeline set forth in the FCC’s RDOF milestones.¹

2. **Will Lifeline subscribers choose from services generally available to the public? Or will Starlink have specific offerings for Lifeline subscribers? Does Starlink agree to provide Lifeline service that complies with FCC minimum service standards for Lifeline service published annually? Provide a description of the different service options available to Lifeline subscribers that satisfy minimum service standards. 47 CFR §§ 54.101(d), 54.401, 54.403(b), 54.408. Link to DA 20-820 - Lifeline Minimum Service Standards Effective 12/01/2020**

RESPONSE:

Starlink Services will provide broadband and voice services to Lifeline customers and commits to complying with all applicable state and federal requirements that apply to those services. The company has not developed a complete description of plans, including rates, terms and

¹ RDOF recipients, including Starlink Services, must offer service to 40% of their awarded locations statewide by the end of the third full calendar year following funding authorization, and 20% each year thereafter, resulting in 100% deployment to funded locations by the end of the sixth calendar year. Starlink Services will meet or exceed these RDOF build-out milestones. Starlink Services will provide Lifeline to locations in Pennsylvania consistent with these milestones.

conditions, for Lifeline services, but it will do so in compliance with the FCC's RDOF milestones.

3. **Describe how Starlink will satisfy 66 Pa.C.S. § 3019(f) Lifeline service. Provide a mockup of a conspicuous biannual bill insert or message that includes eligibility, benefits, and contact information for customers who wish to learn about Lifeline service.* 66 Pa.C.S. § 3019(f)(4).**

RESPONSE:

Starlink Services will provide Lifeline when it deploys its network in Pennsylvania and begins to offer commercial services in accordance with the FCC's RDOF milestones. Starlink Services will permit customers who subscribe to Lifeline to subscribe to additional services at the rates established for such services. Whenever a prospective customer seeks to subscribe to Starlink Services, Starlink Services will explicitly advise the customer of the availability of Lifeline service and shall make reasonable efforts where appropriate to determine whether the customer qualifies for such service and, if so, whether the customer wishes to subscribe to the service. Additionally, Starlink Services will inform existing customers of the availability of Lifeline service twice annually by bill insert or message that is conspicuous and provides information on eligibility, benefits and contact information for customers who wish to learn more about Lifeline. Starlink Services will provide the Department of Public Welfare with information on its Lifeline offering to facilitate its duties under 66 Pa.C.S. § 3019(f)(5).

Starlink Services is still in the early stages of developing advertising material for the Lifeline Program, and as such, does not yet have the documentation requested. Starlink Service will supplement its response to this data request with this information as it becomes available.

4. **Per 47 CFR § 54.405(b), describe how Starlink will perform outreach other than through media of general distribution. Provide a mockup of marketing material for general distribution that the company will use to publicize the availability of Lifeline service.* This can be current advertisement modified to comply w/Lifeline rules. Be sure to include standalone voice service as an option and include offering(s) that satisfy Lifeline minimum service standards and pricing. 47 CFR §§54.101, 54.201(d)(2), 54.401(d), 54.408. 52 Pa. Code § 69.2501.**

RESPONSE:

Starlink Services is still in the early stages of developing advertising material for the Lifeline Program and, as such, does not yet have the documentation requested. Starlink Service will supplement its response to this data request with this information as it become available.

5. **Provide a copy of the company's terms and conditions applicable to generally available voice and broadband service for plain language review. Include backup power disclosure. Provide a mockup of terms and conditions applicable to Lifeline service. This can be in the form of an addendum to generally available terms and conditions. 47 CFR §§ 8.1(a), 9.20, 54.101(d), 54.401(d), 54.422(a)(2). 52 Pa. Code § 69.2501.**

RESPONSE:

Starlink Services has not broadly offered voice and broadband service and is still in the early stages of developing its Lifeline program. As such, Starlink Services does not yet have a set of terms and conditions for its voice and broadband service that will be offered under the Lifeline program. Starlink Services will comply with all federal and Pennsylvania provisions governing Lifeline service.

6. **Will Starlink include the following phrase on all public Lifeline information? *Contact the PA PUC Bureau of Consumer Services for help with unresolved questions or complaints at 1-800-692-7380 or Online Informal Complaint Form.***

RESPONSE:

Yes.

7. **Upon obtaining designation as an ETC, BCS may occasionally request copies of bill messages and/or materials designed to inform customers who wish to learn about Lifeline service and charges. Explain how Starlink will provide marketing material, terms and conditions, and other public documents in languages other than English. 47 CFR §§ 54.201(d)(2), 54.404(b)(9), 54.405(c), (e), (3) and (4)**

RESPONSE:

Pursuant to 47 U.S.C. § 214(e)(2) and 47 C.F.R. § 54.201(d), Starlink Services will advertise the availability and rates of each of the supported services detailed above and the availability of Lifeline benefits throughout its ETC Service Area by media of general distribution, which may include as appropriate, partnerships with national and local service organizations; radio, out-of-home or other localized advertising; digital advertising; and direct to user communications such as direct mail.

Starlink Services commits to providing this information in languages other than English, consistent with applicable FCC and PUC rules.

8. **Provide a draft of Starlink’s policies and procedures regarding household eligibility for Lifeline that includes accessing NLAD for certification, recertification, de-enrollment, de-enrollment for non-usage, dispute resolution, non-transferable benefit, etc.* Include dispute procedures. 47 CFR §§ 54.405, 54.409, 54.410.**

Starlink Services will comply with all FCC requirements relating to household eligibility for Lifeline services, including the use of NLAD and all requirements relating to certification, recertification, de-enrollment and dispute resolution. The company is still in the early stages of developing its Lifeline compliance program, and that program will be operational consistent with the FCC’s RDOF milestones.

9. **Does the company’s credit and deposit practice satisfy 47 CFR § 54.401(c)? Under which circumstances will Starlink require a deposit from Lifeline applicants? Please provide a copy of Starlink’s credit and deposit practice.**

RESPONSE:

Starlink Services will not require a deposit from Lifeline applicants/customers in the circumstances set forth in 47 C.F.R. § 54.401(c).

10. **Can Starlink restrict or block calls to premium rate numbers and international toll calls? 47 CFR § 54.400. If applicable, does Starlink apply roaming charges?**

RESPONSE:

Starlink Services will comply with all applicable FCC rules relating to Lifeline services, including rules pertaining to restriction or blocking of international toll calls and calls to premium rate numbers. As a fixed service provider, roaming charges would be inapplicable to calls placed by Starlink Services’ Lifeline customers.

11. **Describe Starlink’s offer of 8-hour and 24-hour backup power to be offered at point of sale for all voice subscribers, e.g. company-provided power source, charge for installation, subscriber disclosure. Is a subscriber disclosure available in non-English language(s) and in hard copy format? 47 CFR § 9.20.**

RESPONSE:

Starlink Services will offer 8-hour and 24-hour battery back-up options for covered services in compliance with 47 C.F.R. § 9.20. The device will be installable by the user. The Company does not yet have disclosures available in non-English languages or in hard copy format but will supply customers with all the required disclosures at the time the back-up power options are made available with covered services as they are rolled out in accordance with the FCC’s RDOF milestones.

12. **VoIP providers: Provide a sample or mockup of an emergency services 911 warning label or describe other conspicuous means to notify subscribers. 47 CFR § 9.11(b)(5)(iii).**

RESPONSE:

Starlink Services will advise every VoIP subscriber of, and provide the necessary warning labels for, of the circumstances under which E911 service may not be available or may be in some way limited by comparison to traditional E911 service. Such circumstances include, but are not limited to, relocation of the end user's IP-compatible CPE, use by the end user of a non-native telephone number, broadband connection failure, loss of electrical power, and delays that may occur in making a dispatchable location available in or through the ALI database.

13. **What equipment, if any, does a subscriber need to obtain and maintain voice and/or broadband service? If company-owned or leased equipment is required, please provide warranty information. Indicate related charges, if any.**

RESPONSE:

Customers access the Starlink Network using an advanced phase-array terminal designed to connect directly to the satellite assigned to serve the area in which the customer is located. For VoIP services, customers will have the option of using a third party, conventional phone connected to a Session Initiation Protocol standards-compliant analog terminal adaptor or a native-IP phone selected from a list of certified models. The terminal adaptor will be available for purchase to customers utilizing Starlink for voice services. Starlink anticipates charging \$499 for equipment.

14. **Provide a list of charges for services and equipment necessary to establish and maintain Lifeline voice and/or broadband service. Identify the vertical services included at no additional charge, e.g. voicemail, caller I.D., and the charges for optional vertical services. 47 CFR §§ 54.201(d)(2), 54.401(b).**

RESPONSE:

See response to question 13 above. Starlink Services has not yet determined what features will be part of its VoIP offering. When the company begins offering Lifeline services in accordance with the FCC's RDOF milestones, the company will apply Lifeline discounts to broadband and VoIP services and the relevant service features consistent with the FCC's rules.

15. **Which charges/fees will the company waive for Lifeline subscribers, if any, e.g. porting, toll-blocking, installation, battery backup, etc.? See also 47 CFR § 54.401.**

RESPONSE:

When Starlink Services rolls out Lifeline services in accordance with the FCC's RDOF milestones, it will charge Lifeline customers and waive fees as required by the applicable FCC rules.

16. **Does Starlink intend to offer Lifeline service on a prepaid or postpaid basis? Describe intended billing and payment options available to Lifeline subscribers. 52 Pa Code Chapter 64. Note that 52 Pa. Code § 53.85 prohibits a paper billing fee.**

RESPONSE:

Starlink Services has not yet determined what billing options it will make available to Lifeline customers. Once Lifeline services are commenced in accordance with the FCC's RDOF milestones, the company will offer billing options, and will assess all charges, in accordance with applicable FCC and PUC rules.

17. **When does Starlink anticipate it will begin to offer Lifeline in designated service areas? Pennsylvania ETCs are required to annually report enrollment and disconnections data using the Lifeline Tracking portal. The Lifeline Tracking Report is due on or before June 30. Carriers are to inform BCS when the company begins to provide service, and to request access to the online reporting portal by sending an email to BCS staff at RA-PCTELCO-PA@pa.gov.**

RESPONSE:

RDOF recipients, including Starlink Services, must offer service to 40% of their awarded locations statewide by the end of the third full calendar year following funding authorization, and 20% each year thereafter, resulting in 100% deployment to funded locations by the end of the sixth calendar year. Starlink Services will meet or exceed these RDOF build-out milestones. Starlink Services will provide Lifeline to locations in Pennsylvania consistent with these milestones. Starlink will contact the Bureau of Consumer Services at least 30 days in advance of providing Lifeline services and will request access to the online reporting portal.

18. **Has Starlink obtained any waivers or exceptions from the FCC pertaining to high-cost or low-income support?**

RESPONSE:

No.

19. **When did or will Starlink contact which municipalities in its service areas to arrange for the provision of 911/E911 emergency service? Is an E911 feature included with standalone and bundled voice service? Will Lifeline subscribers have access to 911/E911 emergency service if service is suspended?**

RESPONSE:

As Starlink Services rolls out its VoIP services in accordance with the FCC's RDOF milestones, the company will ensure that all of its VoIP customers, including participants in the Lifeline program, have full access to E911 services in compliance with all FCC rules relating to E911 and Lifeline. Starlink Services or its third-party managed VoIP provider will ensure that the necessary arrangements are in place with municipalities for this purpose.

20. **What is the company's procedure when responding to service requests and complaints, e.g. response time, warranted equipment, contractors?**

The PUC's BCS handles consumer complaints and inquiries informally – primarily, but not limited to 52 Pa. Code Chapters 63 and 64. Please provide details about Starlink's procedure for managing billing disputes and service complaints, i.e. 800# for customer service, intake practices, steps to resolution, and when a customer will be referred to BCS. Please provide contact information that BCS will use in the event BCS receives an informal complaint.

RESPONSE:

At the present time, under the existing Starlink beta service program, our customer support hours of operations are from 7:00 a.m. to 11:30 p.m. (Pacific Time), seven days a week.

Under the beta service program, if a customer has a complaint they can either: (1) log into their account in the Starlink Customer Support Portal and submit a Customer Support Request describing their issue and desired resolution; OR (2) send an email complaint describing their issue and desired resolution to starlinkresolutions@spacex.com. Prior to activating customers under the RDOF program, Starlink Services will provide a phone-based customer service mechanism that

allows customers to reach out with inquiries and complaints. These services will be handled by the Starlink Services customer support team.

If the customer is not satisfied with Starlink Services' proposed resolution, the customer will be advised that he/she may file a complaint with the PA PUC and will provide the PUC's toll-free number and address.

Contact information for service of informal complaints:

R. Edward Price
Senior Counsel
Starlink Services, LLC
1155 F Street, NW, Suite 475
Washington, DC 20004
ted.price@spacex.com
Tel: (585) 455-6672

21. **Please provide contact information that will appear in the PUC's publication, *Stay Connected* that is linked here - <http://www.puc.pa.gov/Telecom/pdf/Lifeline%20Brochure-StayConnected.pdf>**

Per 66 Pa.C.S. § 3019(f)(5), ETCs are to supply the Pennsylvania Department of Human Services (PA DHS) with Lifeline service descriptions, marketing material, contact information, and a listing of service areas. Forward this information to:

**Mr. Frank Slenker, Human Services Program Specialist Supervisor (HSPSS)
Department of Human Services, OIM Bureau of Policy
1006 Hemlock Drive
Harrisburg, PA 17110
Phone: 717-705-8292
Email: RA-PWDFPPMAILBOX@pa.gov**

RESPONSE:

Starlink Services should be listed in Stay Connected as follows:

Starlink Services, LLC
1 Rocket Road
Hawthorne, CA 90250
Tel: (855) 753-2495

22. Will Starlink elect to participate in the Emergency Broadband Benefit Program in Pennsylvania? If yes, will the company elect to participate as an ETC? If so, does the company's service area identified in its petition include Lifeline-only support for areas in addition to the RDOF-awarded high-cost service areas?

RESPONSE:

No.

23. Will Starlink offer SIP standards-compliant analog terminal adaptors or native IP phones for sale or lease? Petition pg 10. If so, please provide consumer information indicated at #'s 13, 14, and 20 above.

RESPONSE:

See responses to questions 13, 14 and 20 above.

24. Starlink indicates it will offer toll-limitation services upon being designated an ETC. How does the company inform potential Lifeline subscribers of fees for service outside the local usage area? Please provide an outline of toll charges for phone calls beyond a local calling service. Petition pg 11.

RESPONSE:

Starlink Services will formulate its charges for Lifeline services when those services are rolled out in accordance with the FCC's RDOF milestones.

25. Starlink states it will offer voice and broadband service at rates that are reasonably comparable to rates offered in urban areas. Will the company comply with annual results of the Urban Rate Survey published annually by the FCC?

RESPONSE:

Yes.

26. Starlink's RDOF winning bid was awarded to provide 59,200 locations in Pennsylvania with the above baseline tier speed at greater than 100/20 Mbps, a monthly usage allowance of greater than or equal to 2 terabytes at low latency. Is this correct?

RESPONSE:

Yes.

27. **Please describe Starlink's intended outreach efforts to publicize availability of Lifeline services.**

RESPONSE:

Starlink Services is still in the early stages of developing advertising material for the Lifeline Program. Starlink Services will advertise the availability of Lifeline benefits throughout its ETC Service Area by media of general distribution which may include as appropriate, partnerships with nation and local service organizations; radio, out-of-home or other localized advertising; digital advertising; and direct to user communications such as direct mail.

By: /s/ R. Edward Price

R. Edward Price
Senior Counsel
SPACE EXPLORATION TECHNOLOGIES CORP.
PARENT COMPANY OF STARLINK SERVICES, LLC
1155 F Street, N.W.
Suite 475
Washington, DC 20004
Ted.Price@spacex.com
(585) 455-6672