



May 17, 2021

**VIA E-FILING**

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Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120

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

**Request for “Good Faith” Letter**

Dear Secretary Chiavetta:

Please be advised that this office represents Starlink Services, LLC (“Starlink”) in the above-referenced matter. A notice of appearance is being filed with the Commission on the same date as this letter.

As a winning bidder in the Federal Communications Commission’s (“FCC’s”) Rural Digital Opportunities Fund auction, Starlink is required to submit proof of eligible telecommunications carrier (“ETC”) designation in the states for which it won such funding within 180 days of the public notice identifying winning bidders (*i.e.*, by June 7, 2021). *In the Matter of Rural Digital Opportunity Fund, Connect America Fund, WC Docket Nos. 19-126 and 10-90 (Feb. 7, 2021), paras. 81, 92.* Winning bidders that do not obtain an ETC designation for a particular state by June 7 may seek a waiver of the deadline from the FCC. *Id.* para. 81 & n.230. Starlink intends to submit a waiver request for Pennsylvania to the FCC on the grounds that it is making a good faith effort to obtain ETC designation in a timely manner. Starlink filed its Petition requesting ETC designation on January 5, 2021<sup>1</sup> and filed additional supporting documentation on January 13, 2021. Starlink filed answers to the Bureau of Consumer Services’ Data Requests – Set I on March 17, 2021. Starlink expects to submit answers to the Bureau of Consumer Services’ Data Requests – Set II later this week.

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<sup>1</sup> Winning bidders like Starlink that submitted their state ETC applications by January 6, 2021, are presumed by the FCC to be pursuing those applications in good faith for purposes of receiving a waiver. *See id.*

To support its waiver request, Starlink respectfully requests that the Pennsylvania Public Utility Commission issue a letter indicating that Starlink is making a good faith effort to obtain ETC designation in Pennsylvania in a timely manner.

Please contact me if you have any question or concern. Thank you for your attention to this matter.

Sincerely,

COZEN O'CONNOR



By: David P. Zambito  
Counsel for *Starlink Services, LLC*

DPZ/kmg  
Enclosure

cc: Joseph P. Cardinale, Jr., Esq. (*Law Bureau*)  
Ted Price, Esq. (Senior Counsel, SpaceX)