



May 28, 2021

**VIA E-FILING**

**David P. Zambito**

Direct Phone 717-703-5892  
Direct Fax 215-989-4216  
dzambito@cozen.com

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building - 2nd Floor  
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**

**Answers to Data Requests of the Bureau of Consumer Services - Set II, Nos. 1-24 and 26**

Dear Secretary Chiavetta:

Enclosed for filing with the Pennsylvania Public Utility Commission ("Commission") are the verified answers of Starlink Services, LLC ("Starlink Services") to the above-referenced data requests. Please note that Starlink Services will answer Set II, No.25 in a supplemental response.

Please contact me if you have any question or concern about the enclosed. Thank you.

Sincerely,

Cozen O'Connor

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

DPZ:kmg  
Enclosures

cc: Joseph P. Cardinale, Jr. (Law Bureau)  
R. Edward Price, Esq.

**VERIFICATION**

I, R. Edward Price, hereby state that the facts set forth above are true and correct to the best of my knowledge, information and belief and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Date: May 28, 2021

  
\_\_\_\_\_

**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 – SET II**

1. **Please explain what necessary internal and third-party vendor resources will be deployed so that Lifeline services will be offered and provided to consumers who qualify.**

**RESPONSE:**

Starlink Services, LLC (“Starlink Services”) incorporates by reference its answer to the Bureau of Consumer Services Data Requests – Set I, No. 1. By way of further answer, in order to provide Lifeline services, Starlink Services must offer both VoIP and broadband services to customers who qualify for participation in the Lifeline program. Starlink Services will determine the manner in which it will provide VoIP services, either through its own solution or using the services of a white-label managed service provider, and will roll those services out in accordance with the FCC’s RDOF milestones, the first of which does not occur until 2024. Starlink would not object to the Commission directing it to submit a supplemental response at least one year prior to the first RDOF milestone. Starlink will also ensure that it performs the necessary customer validation, advertising, billing and reporting in accordance with the FCC’s requirements for Lifeline services at that time.

**RESPONSE PROVIDED BY:** R. Edward Price, Esq.  
Senior Counsel, Space Exploration Technologies Corp.

**DATE:** May 28, 2021

**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 – SET II**

2. **Provide a draft of Starlink’s policies and procedures regarding household eligibility for Lifeline that includes application, certification, recertification, de-enrollment, dispute resolution, and other applicable rules. Include interaction with the Universal Service Administration Company’s National Verifier, record retention, etc.**

**RESPONSE:**

Starlink Services incorporates by reference its answer to the Bureau of Consumer Services Data Requests – Set I, No. 8. By way of further answer, below is a draft of Starlink Services’ policies and procedures. Please note, however, that Starlink Services will review and update the draft to ensure the accuracy of information at that time, as well as compliance with applicable statutes and regulations. Starlink Services will not finalize the draft until closer to the time of rolling those services out in accordance with the FCC’s RDOF milestones, the first of which does not occur until 2024. Starlink would not object to the Commission directing it to submit an updated draft at least one year prior to the first RDOF milestone.

Starlink Services will utilize the Universal Service Administrative Company’s (“USAC’s”) National Verifier and query the National Lifeline Accountability Database (“NLAD”) prior to enrolling eligible consumers in Starlink Services Lifeline services. Pursuant to 47 C.F.R. § 54.410(b)(2), Starlink Services will not enroll a subscriber in Lifeline unless it receives notice from the National Verifier that the subscriber has met the income-eligibility criteria set forth in 47 C.F.R. § 54.409(a)(1). Starlink Services will direct prospective Lifeline subscribers to the National Verifier at <https://www.checklifeline.org/lifeline> for initial certification. Subscribers may complete their eligibility application through the National Verifier via either the online portal or by using the paper form provided by USAC.<sup>1</sup>

Starlink Services will comply with the provisions of 47 C.F.R. § 54.404(b), including querying NLAD to determine whether a prospective Lifeline subscriber who has executed a certification pursuant to § 54.410(d) is currently receiving a Lifeline service from another eligible telecommunications carrier and whether anyone else living at the

---

<sup>1</sup> An example of USAC’s eligibility paper form is available at [https://www.usac.org/wp-content/uploads/lifeline/documents/forms/LI\\_Worksheet\\_UniversalForms-1.pdf](https://www.usac.org/wp-content/uploads/lifeline/documents/forms/LI_Worksheet_UniversalForms-1.pdf).

prospective subscriber's residential address is currently receiving a Lifeline service. If the NLAD indicates that a prospective subscriber, who is not seeking to port his or her telephone number, is currently receiving a Lifeline service, Starlink Services will not enroll the subscriber in Lifeline. Additionally, if the NLAD indicates that another individual at the prospective subscriber's residential address is currently receiving a Lifeline service, Starlink Services will not seek Lifeline reimbursement for providing service to that prospective subscriber, unless the prospective subscriber has certified, pursuant to § 54.410(d), that to the best of his or her knowledge, no one in his or her household is already receiving a Lifeline service. Upon notification by the NLAD administrator that a subscriber is receiving Lifeline service from another eligible telecommunications carrier or that more than one member of a subscriber's household is receiving Lifeline service, Starlink Services will de-enroll the subscriber from participation in that carrier's Lifeline program within five business days.

In the format proscribed by the NLAD administrator, Starlink Services will transmit to the NLAD each new and existing Lifeline subscriber's full name; full residential address; date of birth and the last four digits of the subscriber's Social Security number or Tribal Identification number, if the subscriber is a member of a Tribal nation and does not have a Social Security number; the telephone number associated with the Lifeline service; the date on which the Lifeline service was initiated; the date on which the Lifeline service was terminated, if it has been terminated; the amount of support being sought for that subscriber; and the means through which the subscriber qualified for Lifeline. Prior to transmitting such information to the NLAD administration, Starlink Services will obtain, from each new and existing subscriber, consent to transmit the subscriber's information. In obtaining such consent, Starlink Services will describe to the subscriber, using clear, easily understood language, the specific information being transmitted, that the information is being transmitted to the NLAD administrator to ensure the proper administration of the Lifeline program, and that failure to provide consent will result in subscriber being denied the Lifeline service. Starlink Services will update existing Lifeline subscriber's information in the NLAD within ten business days of receiving any change to that information.

If Starlink Services has a reasonable basis to believe that a Lifeline subscriber no longer meets the criteria to be considered a qualifying low-income consumer, Starlink Services will notify the customer of the impending termination. This notification of impending termination will be sent to the customer in writing separate from the customer's monthly bill, and will be written in clear, easily understood language. Starlink Services will allow a subscriber 30 days following the date of the impending termination letter required to demonstrate continued eligibility. If the customer does not respond to the notification, Starlink Services will de-enroll the subscriber within five business days of the deadline to respond. Starlink Services will also de-enroll customers upon a notification from USAC that the customer is receiving duplicative Lifeline. Starlink Services will abide by the FCC rules governing de-enrollment for non-usage and failure to re-certify. Starlink Services will de-enroll a customer upon request within two business days of such request. When Starlink Services de-enrolls a subscriber, it will transmit to the NLAD the date of Lifeline de-enrollment within one business day.

For annual re-verification, Starlink Services will direct Lifeline subscribers to the National Verifier at <https://www.checklifeline.org/lifeline>. Current subscribers will complete annual re-certification through the National Verifier via either the online portal or by using the paper form provided by USAC.

Starlink Services shall retain all records required to demonstrate to auditors that RDOF support received was consistent with the universal service high-cost program rules for at least ten years from the receipt of funding.

**RESPONSE PROVIDED BY:** R. Edward Price, Esq.  
Senior Counsel, Space Exploration Technologies Corp.

**DATE:** May 28, 2021

**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 – SET II**

3. Will Starlink incorporate the following information during consumer interactions?

*Whenever a prospective customer seeks to subscribe to local exchange telecommunications service from an eligible telecommunications carrier, the carrier shall 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.*

**RESPONSE:**

Yes. Starlink will include this information on scripts it uses for customer interactions.

**RESPONSE PROVIDED BY:** R. Edward Price, Esq.  
Senior Counsel, Space Exploration Technologies Corp.

**DATE:** May 28, 2021

**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 – SET II**

4. **Provide a mockup of a conspicuous biannual bill message that includes eligibility, benefits and contact information for customers who wish to learn about Lifeline service. Include that consumers can request an application be mailed by calling USAC at 1-800-234-9473 (Or by calling Starlink). The biannual bill message should satisfy 66 Pa.C.S. § 3019(f)(4) and 47 C.F.R. § 54.405.**

**RESPONSE:**

Starlink Services incorporates by reference its response to Bureau of Consumer Services Data Requests – Set I, No. 3. By way of further answer, Attachment II-4 is a draft of Starlink Services’ biannual bill message. Please note, however, that Starlink Services will review and update the draft to ensure the accuracy of information at that time (including but not limited to the highlighted items on the attachment), and to ensure compliance with applicable statutes and regulations. Starlink Services will not finalize the draft until closer to the time of rolling its services out in accordance with the FCC’s RDOF milestones, the first of which does not occur until 2024. Starlink would not object to the Commission directing it to submit an updated draft at least one year prior to the first RDOF milestone.

**RESPONSE PROVIDED BY:** R. Edward Price, Esq.  
Senior Counsel, Space Exploration Technologies Corp.

**DATE:** May 28, 2021



## **Representative Sample Does Not Represent An Actual Starlink Advert**

### **About Lifeline**

Lifeline service is a government assistance program that provides one of two types of discounts to eligible participants:

- \$7.25 monthly discount on the cost of your telephone-only service OR
- \$9.25 monthly discount on a qualified internet access service, with or without telephone service

You can only use Lifeline for your phone or internet service, not both.

Lifeline is non-transferable, meaning you can not transfer the discount from one person to another. The benefit is limited to one discount per household and only eligible customers may enroll.

### **Eligibility**

#### *Participation in Federal Assistance Programs*

To receive the monthly Lifeline discount, you or someone in your household must show proof that you receive benefits from at least one of these programs:

- Federal Public Housing Assistance (Section 8)
- Medicaid
- Supplemental Nutrition Assistance Program (SNAP) formerly Food Stamps
- Supplemental Security Income (SSI)
- VA Survivors Pension
- VA Veterans Pension (Supplemental Income for Wartime Veterans)

#### *Tribal Land Residents*

If you live on Tribal lands, you can qualify for Lifeline if you or someone in your household participates in at least one of the following programs:

- Any of the federal assistance programs listed above
- Bureau of Indian Affairs General Assistance
- Food Distribution Program on Indian Reservations (FDPIR)
- Head Start (Income-Based)
- Tribally Administered Temporary Assistance for Needy Families (Tribal TANF)

Tribal Lands residents also qualify for an additional monthly credit of up to \$25.00 with Enhanced Tribal Lifeline and up to \$100.00 toward installation fees with Tribal Link-Up Assistance.

#### *Annual Income*

You may also qualify for the monthly Lifeline discount if your annual income is at or below 135% of the Federal Poverty Guidelines.

### **Apply for Lifeline**

Please complete your Lifeline application [\[insert link to the lifeline application\]](#) and return it to the Universal Service Administrative Company (USAC) along with proof of eligibility. Alternatively, you can apply online



**Representative Sample  
Does Not Represent An Actual Starlink Advert**

at [CheckLifeline.org](https://www.checklifeline.org). Consumers can request an application be mailed by calling USAC at 1-800-234-9473 or through Starlink.

Once your application and proof of eligibility has been submitted, the USAC will notify you of your eligibility status. Once you have been approved for Lifeline, please contact Starlink Customer Support to have the Lifeline discounts added to your account.

**Changes in Eligibility**

You must verify your continued eligibility every year (or as requested) with USAC. You must notify USAC when you are no longer eligible for Lifeline.

If there is someone else at your address who is receiving a Lifeline discount and you wish to be considered a separate economic unit, you must submit a separate Lifeline Application [\[insert link to the lifeline application\]](#) and proof of eligibility.

For more information, please contact [Starlink Customer Support](#).

**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 – SET II**

5. **Provide a mockup of marketing material for general distribution to publicize the availability of Lifeline service. Be sure to include a description of broadband plans and standalone voice service as an option. Offerings are to satisfy Lifeline minimum service standards and pricing as well as at least one offering at SpaceX’s RDOF winning bid performance tier.**

**RESPONSE:**

Starlink Services incorporates by reference its response to Bureau of Consumer Services Data Requests – Set I, No. 4. By way of further answer, Attachment II-4 is a draft of Starlink Services’ marketing materials. Please note, however, that Starlink Services will review and update the draft to ensure the accuracy of information at that time (including but not limited to the highlighted items on the attachment), and to ensure compliance with applicable statutes and regulations closer to the time of rolling its services out in accordance with the FCC’s RDOF milestones, the first of which does not occur until 2024. Starlink would not object to the Commission directing it to submit an updated draft at least one year prior to the first RDOF milestone.

**RESPONSE PROVIDED BY:** R. Edward Price, Esq.  
Senior Counsel, Space Exploration Technologies Corp.

**DATE:** May 28, 2021

**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 – SET II**

6. **Provide a draft copy of Starlink’s terms and conditions applicable to generally available voice and broadband service. Include Starlink’s credit and deposit practice, billing and payment practice, late payment fee, service suspension, termination and reconnection procedures**

**RESPONSE:**

Starlink Services incorporates by reference its response to Bureau of Consumer Services Data Requests – Set I, No. 5. By way of further answer, Starlink Services has not yet developed terms and conditions that will apply in the RDOF territories, but will do so as it rolls out service in accordance with the RDOF milestones. For the terms and conditions that apply to SpaceX’s beta service, see <https://www.starlink.com/legal/terms-of-service?regionCode=US>.

**RESPONSE PROVIDED BY:** R. Edward Price, Esq.  
Senior Counsel, Space Exploration Technologies Corp.

**DATE:** May 28, 2021

**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 – SET II**

7. **Will Starlink require a deposit from Lifeline subscribers for broadband access service?**

**RESPONSE:**

Starlink Services incorporates by reference its response to Bureau of Consumer Services Data Requests – Set I, No. 9. By way of further answer, Starlink Services will not require a deposit from Lifeline subscribers for broadband access service.

**RESPONSE PROVIDED BY:** R. Edward Price, Esq.  
Senior Counsel, Space Exploration Technologies Corp.

**DATE:** May 28, 2021

**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 – SET II**

8. Please provide a link to Starlink’s publicly accessible Internet Service Provider (ISP) disclosure.

**RESPONSE:**

Starlink Services has not yet developed an ISP disclosure but will do so as it rolls out broadband services in accordance with the RDOF milestones, the first of which does not occur until 2024. Starlink would not object to the Commission directing it to submit a draft at least one year prior to the first RDOF milestone.

**RESPONSE PROVIDED BY:** R. Edward Price, Esq.  
Senior Counsel, Space Exploration Technologies Corp.

**DATE:** May 28, 2021

**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 – SET II**

9. **Provide a draft copy of Starlink’s terms of service for consumers that apply to Lifeline. This can be an addendum to terms and conditions for generally available voice and broadband access service.**

**RESPONSE:**

Starlink Services incorporates by reference its response to Bureau of Consumer Services Data Requests – Set I, No. 5. At this time, Starlink anticipates that the terms and conditions of service for consumers that apply to Lifeline will be an addendum to the terms and conditions for generally available voice and broadband access service. However, as noted previously, Starlink Services does not yet have terms and conditions for generally available voice and broadband access service. Those generally-applicable terms and conditions will be developed in conjunction with the company’s roll out of VoIP and broadband services in the RDOF territories in accordance with the RDOF milestones, the first of which does not occur until 2024. *See* response to Bureau of Consumer Services Data Request – Set II, No. 6. Consequently, Starlink Services will develop its addendum at that time.

Nevertheless, Starlink Services anticipates that this addendum will advise Lifeline customers of the applicable Lifeline discount, as described in Attachment II-4, and will notify them of the policies and procedures for establishing eligibility for Lifeline. *See*, response to Bureau of Consumer Services Data Request – Set II, No. 2. Attachment II-9 is an initial draft of such an addendum to the generally-applicable terms and conditions of Starlink Services’ service. Starlink Services will review and update the draft, based on the contents of its generally-applicable terms and conditions of service, to ensure the accuracy of information at the time, and to ensure compliance with applicable statutes and regulations. Starlink would not object to the Commission directing it to submit a draft of this addendum at least one year prior to the first RDOF milestone.

**RESPONSE PROVIDED BY:** R. Edward Price, Esq.  
Senior Counsel, Space Exploration Technologies Corp.

**DATE:** May 28, 2021

Attachment II-9

DRAFT of Addendum Stating Terms and Conditions of Service

For Lifeline Customers

For customers that are enrolled in Lifeline, following the procedures described in Starlink Service's Policies and Procedures, Starlink Services will modify the above Terms and Conditions of Service as set forth below:

1. Starlink Services will apply the applicable Lifeline monthly discount (\$7.25 monthly on the cost of telephone-only service OR \$9.25 monthly on qualified internet access service, with or without telephone service) to the monthly charge for service. This discount can be applied for phone or internet service, but not both.
2. Starlink Services will not charge Lifeline customers a deposit, an installation fee or activation fee, or a discontinuation fee.
3. Lifeline service is non-transferable. Consequently, it cannot be transferred from one person to another.

**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 – SET II**

10. **How will standalone voice and broadband consumers be aware of Starlink’s disclosures/terms of service prior to ordering service?**

**RESPONSE:**

They will order services through the website and will see and agree to the terms and conditions as part of the ordering process.

**RESPONSE PROVIDED BY:** R. Edward Price, Esq.  
Senior Counsel, Space Exploration Technologies Corp.

**DATE:** May 28, 2021

**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 – SET II**

11. **Provide a draft copy of Starlink’s backup power disclosure. This can include notification of limitations to accessing 911/E911 emergency services in lieu of a warning label; or provide a sample copy of a sticker or label that will be provided to consumers warning them that E911 service may be limited or unavailable.**

**RESPONSE:**

Starlink Services incorporates by reference its response to Bureau of Consumer Services Data Requests – Set I, Nos. 5, 11 and 12. By way of further answer, 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, but they will be developed as services are rolled out in accordance with the FCC’s RDOF milestones, the first of which does not occur until 2024. Starlink would not object to the Commission directing it to submit a draft of its backup power disclosure at least one year prior to the first RDOF milestone.

**RESPONSE PROVIDED BY:** R. Edward Price, Esq.  
Senior Counsel, Space Exploration Technologies Corp.

**DATE:** May 28, 2021

**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 – SET II**

12. **In its response to the first data request #12, Starlink states that access to E911 may be limited or unavailable to an end user of a non-native telephone number. Please explain.**

**RESPONSE:**

VoIP services can be used from virtually any internet connection anywhere. If a customer makes a phone call from a location other than the customer’s premises, the E911 call may not connect to the 911 call center serving the customer’s actual physical location at the time of the call. Nevertheless, considering the FCC’s rules that apply to interconnected VoIP providers such as Starlink Services, Starlink Services’ answer to Data Request – Set I No. 12 should be modified to read as follows:

Starlink Services will advise every VoIP subscriber of, and provide the necessary warning labels for, 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, broadband connection failure, loss of electrical power, and delays that may occur in making a dispatchable location available in or through the ALI database.

**RESPONSE PROVIDED BY:** R. Edward Price, Esq.  
Senior Counsel, Space Exploration Technologies Corp.

**DATE:** May 28, 2021

**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 – SET II**

13. To retain a record, how will Starlink obtain affirmative acknowledgement that each subscriber understands the circumstances that E911 service may be limited or unavailable? 47 C.F.R. § 9.11(b)(5)(ii)

**RESPONSE:**

Customers ordering service will see and agree to Starlink Services' terms and conditions. For customers ordering VoIP, the terms and conditions to which the customer agrees will include all required disclosures concerning E911.

**RESPONSE PROVIDED BY:** R. Edward Price, Esq.  
Senior Counsel, Space Exploration Technologies Corp.

**DATE:** May 28, 2021

**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 – SET II**

14. Will Starlink’s voice service enable calls to operator services and N11 numbers such as 211, 411 (directory assistance), 711, 811?

**RESPONSE:**

Starlink Services’ voice service will enable calls to all N11 numbers to which it is required by law to enable such calls.

**RESPONSE PROVIDED BY:** R. Edward Price, Esq.  
Senior Counsel, Space Exploration Technologies Corp.

**DATE:** May 28, 2021

**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 – SET II**

15. **In its responses to the first data request #13, Starlink anticipates charging \$499 for equipment. Lifeline is an affordability program. Does “equipment” include purchase and installation of an advanced phase-array terminal? Please be specific about what is included in pricing.**

**RESPONSE:**

Starlink Services incorporates by reference its response to Bureau of Consumer Services Data Requests – Set I, Nos. 13-16 (noting that Starlink Services has not yet determined what features will be part of its VoIP offering and that the company will apply Lifeline discounts and waive fees as required by applicable FCC rules). By way of further answer, the equipment used with the Starlink broadband service, known as the Starlink Kit, includes the Starlink antenna, wifi router, power supply, cables, and mounting tripod. The Kit is sent directly to the consumer and is intentionally designed to be very easy to set up. Because customers set up the Starlink Kits themselves, there is no installation charge. Space Exploration Technologies Corp. currently charges each of its customers a single, upfront cost of \$499 for the equipment. The same equipment will enable Starlink Services’ customers to receive broadband internet access service as well as voice telephone service on a bundled or standalone basis via voice over internet protocol 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. There is no minimum service term. Customers can cancel service at any time. If a customer cancels service within 30 days of shipment of the Starlink Kit and returns it, they receive a full refund of the \$499.

**RESPONSE PROVIDED BY:** R. Edward Price, Esq.  
Senior Counsel, Space Exploration Technologies Corp.

**DATE:** May 28, 2021

**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 – SET II**

16. **Is equipment covered by a warranty? If so, please provide warranty information.**

**RESPONSE:**

Starlink Services incorporates by reference its response to Bureau of Consumer Services Data Requests – Set I, No. 13. By way of further answer, Starlink Services will offer a one-year limited warranty on the equipment. If the Starlink Kit or Services fail to meet the limited warranty standard, the company will either: (a) cure the discrepancy within 30 days of receiving the claim, including, at Starlink Services choice, by replacing or repairing the Starlink Kit (with a new, different or refurbished device or part), or (b) offer the customer the option to cancel Services and return the Starlink Kit for a partial refund calculated on a 12-month straight-line depreciation basis. Once 12 months have passed from the delivery of the Starlink Kit, the sole remedy is that the customer can cancel Services any time and stop recurring charges starting the following month, but they are no longer entitled to any refunds (or any other remedies).

**RESPONSE PROVIDED BY:** R. Edward Price, Esq.  
Senior Counsel, Space Exploration Technologies Corp.

**DATE:** May 28, 2021

**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 – SET II**

17. **Will Starlink charge an installation fee or activation fee? What other recurring or non-recurring fees will Lifeline subscribers incur to establish, maintain or discontinue voice and/or broadband services? Provide a draft price list.**

**RESPONSE:**

Starlink Services incorporates by reference its response to Bureau of Consumer Services Data Requests – Set II, No. 15 (and the responses referenced therein). There will be no installation, activation or discontinuation fee. There will be a monthly recurring charge for the services. Starlink Services has not yet determined the monthly recurring charge, but it will comply with the FCC’s RDOF requirements.

**RESPONSE PROVIDED BY:** R. Edward Price, Esq.  
Senior Counsel, Space Exploration Technologies Corp.

**DATE:** May 28, 2021

**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 – SET II**

18. **Will Starlink charge for toll calls or include long distance with local calling? If long distance is included with local calling, please describe the calling area, e.g., contiguous 48 states.**

**RESPONSE:**

Starlink Services incorporates by reference its response to Bureau of Consumer Services Data Requests – Set I, No. 24. Starlink Services has not yet determined its pricing for voice calls but will do so in accordance with the RDOF milestones, the first of which does not occur until 2024. Starlink would not object to the Commission directing it to submit a supplemental response at least one year prior to the first RDOF milestone.

**RESPONSE PROVIDED BY:** R. Edward Price, Esq.  
Senior Counsel, Space Exploration Technologies Corp.

**DATE:** May 28, 2021

**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 – SET II**

19. **If Starlink will charge for toll calls, how will the company inform potential Lifeline subscribers of fees for service outside the local calling area? Please provide an outline of toll charges**

**RESPONSE:**

Starlink Services incorporates by reference its response to Bureau of Consumer Services Data Requests – Set I, No. 24 and Set II No.15. By way of further answer, potential customers will order services through the website and will see and agree to the terms and conditions as part of the ordering process. Customers will be informed of applicable rates in a manner that complies with federal and state rules for Lifeline services.

**RESPONSE PROVIDED BY:** R. Edward Price, Esq.  
Senior Counsel, Space Exploration Technologies Corp.

**DATE:** May 28, 2021

**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 – SET II**

20. Please clarify how Starlink will comply with FCC rules relating to toll restrictions or toll blocking for Lifeline subscribers.

**RESPONSE:**

Starlink Services incorporates by reference its response to Bureau of Consumer Services Data Requests – Set I, Nos. 10 and 15, and Set II, No. 18.

**RESPONSE PROVIDED BY:** R. Edward Price, Esq.  
Senior Counsel, Space Exploration Technologies Corp.

**DATE:** May 28, 2021

**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 – SET II**

21. Which vertical services will Starlink include with voice service at no additional cost? Please identify FCC rules that are relevant to service features and waived charges/fees for Lifeline subscribers.

**RESPONSE:**

Starlink Services incorporates by reference its response to Bureau of Consumer Services Data Requests – Set II, No. 18. 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. Starlink would not object to the Commission directing it to submit a supplemental response at least one year prior to the first RDOF milestone.

**RESPONSE PROVIDED BY:** R. Edward Price, Esq.  
Senior Counsel, Space Exploration Technologies Corp.

**DATE:** May 28, 2021

**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 – SET II**

22. **Regarding service requests and service complaints, will Starlink employ a third-party contractor?**

**RESPONSE:**

No.

**RESPONSE PROVIDED BY:** R. Edward Price, Esq.  
Senior Counsel, Space Exploration Technologies Corp.

**DATE:** May 28, 2021

**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 – SET II**

23. **To minimize time out of service, what is Starlink’s target response time for new service orders and resolution of service complaints?**

**RESPONSE:**

As part of its current Beta program, Space Exploration Technologies Corp. tracks several performance metrics across our customer service department, including response time, wait time, resolution time, quality, and escalation rate. We aim to respond to customers within hours (while in Beta), and will aim to resolve most customer inquiries within one hour as we move out of Beta.

**RESPONSE PROVIDED BY:** R. Edward Price, Esq.  
Senior Counsel, Space Exploration Technologies Corp.

**DATE:** May 28, 2021

**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 – SET II**

24. **How will Starlink respond to equipment warranty claims?**

**RESPONSE:**

Starlink Services incorporates by reference its response to Bureau of Consumer Services Data Requests – Set II, No. 16.

**RESPONSE PROVIDED BY:** R. Edward Price, Esq.  
Senior Counsel, Space Exploration Technologies Corp.

**DATE:** May 28, 2021

**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 – SET II**

25. List the names of all the local exchanges where Starlink Services' RDOF-eligible census blocks are located.

**RESPONSE:** Starlink Services will address this question in a supplemental response.

**RESPONSE PROVIDED BY:** R. Edward Price, Esq.

Senior Counsel, Space Exploration Technologies Corp.

**DATE:** May 28, 2021

**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 – SET II**

26. **Describe the methods and technologies Starlink will use to manage traffic spikes and ensure redundancy and reliability of 911 capabilities. Please be specific.**

**RESPONSE:** At the user level, as an additional option and service outside the standard offering, Starlink Services will offer 8-hour and 24-hour battery backup options for covered services that will provide the ability to make phone calls in the event of a power outage. At the system level, Starlink Services is building redundancy into the network. For example, every user will have multiple satellites with which it can communicate. Every satellite will have multiple gateway sites in view with which it can communicate. In the event that a gateway site loses power from the electric grid, traffic will be automatically rerouted to an operating gateway site to ensure that service to each customer is not interrupted. In addition, Space Exploration Technologies Corp.'s Network Operations Center in Redmond, Washington will monitor the network 24x7x365, and "mission control centers" located at various Space Exploration Technologies Corp. facilities across the country will monitor the satellites. At scale, each satellite should have three or more potential gateway sites in view at all times to ensure that all of the satellite's antennas are in use, and the system is fully redundant against a single gateway site going offline for any reason. Starlink typically equips gateway sites with nine steerable antennas for diverse network redundancy. The system is designed to detect failure of any individual gateway antenna and remove it from service. Because end-users will be able to obtain service through multiple satellites and gateways, automatic traffic rerouting is essentially built into the system. The Starlink traffic routing system ensures that every user is served with bandwidth before users demanding more bandwidth get additional throughput assigned, which gives the Starlink network robustness in the event of emergencies requiring high throughput.

**RESPONSE PROVIDED BY:** R. Edward Price, Esq.  
Senior Counsel, Space Exploration Technologies Corp.

**DATE:** May 28, 2021