



November 17, 2021

**VIA E-FILING**

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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**

**Explanation of Why Starlink Services, LLC Will Not Participate in the Emergency Broadband Benefit Program**

Dear Secretary Chiavetta:

In compliance with Ordering Paragraph 17 of the Order entered in this matter on August 26, 2021, Starlink Services, LLC (“Starlink”) hereby explains to the Pennsylvania Public Utility Commission (“Commission”) why Starlink will not participate in the Emergency Broadband Benefit Program (“EBBP”).

The FCC order establishing the EBBP required “participating providers to have offered retail broadband Internet access service to eligible households as of December 1, 2020.” *Emergency Broadband Benefit Program*, WC Docket No. 20-445, Report and Order (Feb. 26, 2021), para. 13. See also 47 C.F.R. § 54.1601(c)(2) (“All participating [EBBP] providers must file an election notice with the Administrator.... At a minimum the election notice should contain ... a statement that, in each state or territory, the provider was a ‘broadband provider’ as of December 1, 2020.”).

Starlink has not yet commenced providing services. Therefore, it may not participate in the EBBP because it was not providing broadband services as of December 1, 2020. Starlink’s parent company, Space Exploration Technologies Corp. (“SpaceX”), began providing broadband services in 2020 to certain customers as part of a beta program. However, as of December 1, 2020, SpaceX had no customers in Pennsylvania. Consequently, neither Starlink nor SpaceX qualifies to participate in the EBBP in Pennsylvania.

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Please contact me if you have any question or concern about this explanation.  
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.