



January 6, 2022

**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**

**Follow-Up to November 19, 2021 Status Report of Starlink Services, LLC**

Dear Secretary Chiavetta:

Ordering Paragraph 3 of the October 28, 2021 Order on Reconsideration in this proceeding requires Starlink Services, LLC ("Starlink") to file a quarterly status report with the Commission, beginning on November 24, 2021. This report is to indicate whether Starlink's network is capable of self-provisioning access to the Public Switched Telecommunications Network ("PSTN") or whether Starlink is securing a third-party managed service provider that will facilitate Starlink's voice service accessing the PSTN. In the alternative, the status report is to indicate whether Starlink has been authorized by the Federal Communications Commission ("FCC") to receive awarded Rural Digital Opportunity Fund ("RDOF") high-cost support in any jurisdiction where it submitted a winning bid.

On November 19, 2021, Starlink filed a status report indicating that Starlink's parent company, Space Exploration Technologies Corp. ("SpaceX") was negotiating with third-party managed service providers ("MSPs") that will facilitate Starlink's voice service accessing the PSTN.

Please be advised that SpaceX entered into an agreement with a voice over internet protocol ("VoIP") MSP on December 21, 2021. The identify of that MSP is set forth in **Attachment A (CONFIDENTIAL)**. **Attachment A** contains information that is competitively sensitive and proprietary. Consequently, SpaceX asks that it be maintained by the Commission in a non-public folder.

Ordering Paragraph 4 of the October 28, 2021 Order on Reconsideration states that the requirement to file a quarterly status report will cease when Starlink proves to the Commission that its qualifying voice telecommunications service is capable of accessing the PSTN. Considering that SpaceX has executed an agreement with an MSP to facilitate Starlink's voice service accessing the PSTN, Starlink respectfully submits that it should no longer be required to file quarterly status reports pursuant to Ordering Paragraph 3. Starlink respectfully requests that the Commission issue a Secretarial Letter to that effect before Starlink's next status report is due (on February 22, 2022).

In addition, pursuant to Paragraph 4 of the August 26, 2021 Order in this matter, Starlink requests that the Commission affirm the designation of Starlink as an ETC throughout its Designated Service Area, so that it will become qualified to receive the federal high-cost support awarded via the RDOF listed in Appendix A to that Order.

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

Sincerely,

Cozen O'Connor



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

DPZ:kmg  
Enclosures

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