



September 14, 2020

VIA IBFS

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: IBFS File No. SAT-LOA-20190704-00057; Call Sign S3051

Dear Ms. Dortch:

On behalf of Kuiper Systems LLC, a wholly owned subsidiary of Amazon.com Services LLC (collectively, "Amazon"), we object to the non-party Sept. 2, 2020, request for reconsideration and stay of the Commission's order authorizing Amazon's non-geostationary satellite orbit system.¹ The request for reconsideration is untimely.² Moreover, the facts and arguments raised in the request have already been considered and addressed by the Commission.³

Respectfully submitted,

/s/ C. Andrew Keisner

C. Andrew Keisner
Lead Counsel
Kuiper Systems LLC,
an Amazon subsidiary
410 Terry Avenue North
Seattle, WA 98109

CC: Nina Beety

¹ See generally *In re Kuiper Systems LLC*, Order and Authorization, IBFS File No. SAT-LOA-20190704-00057 (rel. July 30, 2020) (FCC 20-102).

² 47 U.S.C. § 405(a) (petitions for reconsideration must be filed within 30 days of an order's public notice); 47 C.F.R. § 1.106(f) (same). The D.C. Circuit discourages the Commission from accepting late petitions. *21st Cent. Telesis Jt. Venture v. FCC*, 318 F.3d 192, 199 (D.C. Cir. 2003).

³ The Commission recently concluded a proceeding – in which the requester participated – that thoroughly examined “the effects of our actions on the quality of the human environment, including human exposure to RF energy emitted by Commission-regulated transmitters and facilities.” *In re Proposed Changes in the Commission's Rules Regarding Human Exposure to Radiofrequency Electromagnetic Fields*, ET Docket Nos. 03-137, 13-84, and 19-226, 2019 WL 6681944, at *1 (rel. Dec. 4, 2019) (FCC 19-126). The Commission determined its radiofrequency exposure limits “reflect the best available information concerning safe levels of RF exposure for workers and members of the general public.” *Id.* at *2.