



**The Balance Group**  
8070 Georgia Avenue, Suite 301  
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TO: MEMBERS & PROSPECTIVE MEMBER ORGANIZATIONS  
FROM: THE BALANCE GROUP  
RE: INVITATION: SATELLITE MEGA-CONSTELLATIONS – UPCOMING FCC FILING

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The BALANCE GROUP, on behalf of its member organizations and individual members, will file on Tuesday, Feb. 8, 2022, comments to Federal Communications Commission (FCC) regarding the latest satellite mega-constellation initiatives proposed by SpaceX.

This BALANCE GROUP filing will amplify serious concerns noted in ongoing litigation in Federal Court.

In the ongoing litigation, The BALANCE GROUP raised substantial technical, environmental, human health, national security, cybersecurity and other concerns about a SpaceX proposal to place nearly 5,000 satellites in low earth orbit (LEO).<sup>i</sup>

Now, while that litigation remains unresolved, SpaceX seeks approval to deploy nearly 30,000 satellites, and operate them about 200 kilometers *closer* to earth.<sup>ii</sup> The BALANCE GROUP seeks an environmental review, among other studies, *prior* to any such massive network deployments being approved.

INVITATIONS: JOIN THE FILING: **Should your organization wish to be specifically listed on that filing please email [Ashley@TheBalanceGroup.net](mailto:Ashley@TheBalanceGroup.net) on or before 5pm ET, Monday, February 7, 2022.**

- IF YOU ARE NOT ALREADY A MEMBER, JOIN THE BALANCE GROUP: For prospective members who have yet to join The BALANCE GROUP, membership is without cost. Simply register by clicking here: [Home \(thebalancegroup.net\)](http://Home(thebalancegroup.net))
  - NOTE: VOLUNTEER OPPORTUNITY: If you or your organization possesses specific scientific, environmental, health care, organizational, telecommunications or other skills or advice, there is also a section for registering to offer those skills or advice.

Best regards,

Joseph M. Sandri  
Operating Officer  
THE BALANCE GROUP



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## DETAILS & END-NOTES:

On December 23, 2021, the FCC released a *Public Notice* concerning a SpaceX request for authority to launch and operate a constellation of either of 29,988 satellites at altitudes ranging from 340 km to 614 km, or alternatively, 29,996 satellites at altitudes ranging from 328 km to 614 km.<sup>iii</sup> Originally, comments were due, January 25, 2022. In response to a request for a 30-day extension from Blue Origin (a competing satellite company owned by Amazon's Jeff Bezos), the FCC granted a 15-day extension.<sup>iv</sup> Comments are now due Feb. 8, 2022.

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<sup>i</sup> The BALANCE GROUP v. FCC (Notice of Appeal; May 27, 2021). To read the Notice of Appeal in its entirety click here: [27 may 2021 -balance group notice of appeal to d c circuit final.pdf \(thebalancegroup.net\)](https://www.thebalancegroup.net/27-may-2021-balance-group-notice-of-appeal-to-d-c-circuit-final.pdf)

<sup>ii</sup> FCC Public Notice, Report No. SAT-01598 (Dec. 23, 2021)

<sup>iii</sup> Id. "Space Exploration Holdings, LLC Space Exploration Holdings, LLC (SpaceX) requests authority to construct, deploy and operate a "next-generation" (Gen2) constellation of low-Earth orbit, non-geostationary satellite orbit satellites for provision of broadband in the fixed-satellite service (FSS). SpaceX seeks to operate the Gen2 constellation in one of two alternative configurations depending on the availability of launch vehicles. The first configuration consists of 29,988 satellites at altitudes ranging from 340 km to 614 km, and the second consists of 29,996 satellites at altitudes ranging from 328 km to 614 km. SpaceX requests authority to operate in the FSS using the following frequency bands: 10.7-12.7 GHz, 17.8-18.6 GHz, 18.8-19.3 GHz, 19.7-20.2 GHz, and 71.0-76.0 GHz (space-to-Earth); and 12.75-13.25 GHz, 14.0-14.5 GHz, 27.5-29.1 GHz, 29.5-30.0 GHz, and 81.0-86.0 GHz (Earth-to-space). SpaceX also requests authority to conduct telemetry, tracking, and command operations in the 12.15-12.25 GHz (space-to-Earth), 18.55-18.60 GHz (space-to-Earth), and 13.85-14.0 GHz (Earth-to-space) frequency bands. SpaceX seeks authority to conduct telemetry, tracking, and command operations during orbit raising and deorbit maneuvers and payload testing of the Gen2 satellites. Additionally, SpaceX requests waiver of Sections 25.202(g)(1), 25.208(e), and 25.146(a)(1) of the Commission's rules, and to the extent necessary, of various limitations in the Commission's Schedule S software in connection with this request. This public notice is without prejudice to issues raised on the record of this proceeding by Kuiper Systems, LLC.; Viasat, Inc.; EchoStar Satellite Services LLC. and Hughes Network Systems LLC.; SES Americom and O3B Limited; and Eutelsat S.A., regarding the acceptability of the mutually exclusive proposals in SpaceX's application."

<sup>iv</sup> FCC Public Notice, Report No. SAT-01601 (Jan. 14, 2022).