

STARLINK

February 21, 2024

VIA ELECTRONIC FILING

Ms. Shonda D. Green
Department Secretary
Massachusetts Department of Telecommunications and Cable
1000 Washington Street, Suite 600
Boston, MA 02118

Re: Docket No. 21-1 Petition of Starlink Services, LLC for Designation as an Eligible
Telecommunications Carrier

Dear Ms. Peterson,

Starlink Services, LLC (“Starlink”) was granted the above-captioned authorization (“Authorization”) by the Massachusetts Department of Telecommunication and Cable on June 7, 2021, and hereby requests to withdraw the Authorization. As referenced in its initial application, Starlink applied for the Authorization as a requirement of its winning bids in the Federal Communications Commission’s (“FCC”) Rural Digital Opportunity Fund (“RDOF”) and the scope of the Authorization was limited to the specific census blocks in which Starlink was to receive RDOF support. As Starlink noted in its initial application, it applied for this authorization exclusively in connection with RDOF.

Subsequently, the Wireline Communications Bureau (“Bureau”) denied Starlink’s RDOF “Long Form” application¹, Starlink appealed this Bureau decision to the FCC², and the FCC later affirmed the Bureau’s decision.³ As a result, Starlink will not receive any RDOF support to provide service in the state. Starlink is deeply disappointed and perplexed by the FCC’s decision to exclude the Starlink satellite broadband service from RDOF and this decision directly undermines the very goal of RDOF: to connect unserved and underserved Americans.⁴

As a result of these change in circumstances since the Authorization was applied for and granted, Starlink respectfully requests to relinquish the Authorization. 47 U.S.C. § 214 (e)(4) establishes that an ETC may relinquish its authorization where an area is served by another ETC or where existing customers will continue to be served. Starlink has never received universal services support, nor provided any broadband, voice, or other telecom services in the state.

¹ See *Rural Digital Opportunity Fund Auction Support for 80 Winning Bids Ready to Be Authorized, Bid Defaults Announced*, AU Docket No. 20-34 et al., Public Notice, DA 22-848, at 8-11 (WCB/OEA Aug. 10, 2022).

² See *Application for Review of Starlink Services, LLC*, WC Docket No. 10-90 (filed Sept. 9, 2022).

³ See *Order on Review*, WC Docket No. 10-90, et al. (rel. Dec. 12, 2023).

⁴ SpaceX’s response to these FCC actions is available on the FCC’s website. See Letter from Christopher Cardaci, Vice President, Legal, SpaceX, to Marlene Dortch, Secretary, Federal Communications Commission, In re Long Form Application of Starlink Services, LLC, File No. 0009395128, WC Docket No. 19-126 (December 12, 2023), available at: <https://www.fcc.gov/ecfs/document/121299238977/1>.

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Accordingly, there are no existing Starlink subscribers to consider in connection with Starlink relinquishment the Authorization and Starlink respectfully requests expedited consideration of this request. Starlink notes that the unregulated Starlink-branded broadband service provided by Space Exploration Technologies Corp., a separate entity, remains available in the state and this request for relinquishment will have no impact on those subscribers.

Respectfully Submitted,

/s/ Aishani Shukla
Aishani Shukla, Regulatory Analyst

Attachment: Certificate of Withdrawal