

VIA ELECTRONIC FILING

Mr. Jeff Killip
Executive Director and Secretary of the Commission
Washington Utilities and Transportation Commission
621 Woodland Square Loop, SE
Lacey, WA 98503

Re: Docket No. UT-210059 Application of Starlink Services, LLC for a Certificate of Authority to Construct or Operate Telephone Line, Plant or System (Order 01)

Dear Mr. Killip,

Starlink Services, LLC (“Starlink Services”) was granted the above-captioned authorization (“Authorization”) by the Washington Utilities and Transportation Commission on May 20th, 2021. As referenced in its initial application, Starlink Services 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 Services was to receive RDOF support. As Starlink Services noted in its initial application, it applied for this authorization exclusively in connection with RDOF.

Subsequently, the Wireless Communications Bureau (“Bureau”) denied Starlink Services’ RDOF “Long Form” application¹, Starlink Services appealed this Bureau decision to the FCC², and the FCC later affirmed the Bureau’s decision.³ As a result, Starlink Services will not receive any RDOF support to provide service in the state. Starlink Services 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 Services 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 Services 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 Services subscribers to consider in connection with Starlink Services relinquishment the Authorization and Starlink Services respectfully requests expedited consideration of this request. Starlink Services 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, Regulatory Analyst

Cc: Sean Bennett, Acting Telecommunications Section Manager
Tim Zawislak, Senior Regulatory Analyst