

Agenda Date: April 11, 2024  
Item Numbers: A1 and A2

**Dockets:** UT-210059 and UT-240148  
Company Name: Starlink Services, LLC

Staff: Jonathon Church, Regulatory Analyst  
Sean Bennett, Assistant Director – Telecommunications  
Jing Roth, Deputy Director – Regulatory Services

### **Recommendation:**

In Docket UT-210059, enter Order 02 granting Starlink’s requested for relinquishment of its Eligible Telecommunications Carrier (ETC) designation, effective April 12, 2024.

In Docket UT-240148, enter Order 01 allowing the Company’s voluntary cancellation of telecommunications registration in the State of Washington, also effective April 12, 2024.

### **Background:**

On May 20, 2021, the Washington Utilities and Transportation Commission (Commission) granted an ETC designation to Starlink Services, LLC (Starlink or Company) for purposes of participating in the Federal Communications Commission’s (FCC) Rural Digital Opportunity Fund Phase I high-cost universal service program (RDOF Program) in Order 01 in Docket UT-210059.<sup>1</sup>

On August 10, 2022, the Rural Broadband Auctions Task Force (RBATF), Wireline Competition Bureau (WCB or Bureau), and the Office of Economics and Analytics (OEA) denied Starlink Services’ RDOF “Long Form Application.” The public notice states, “Accordingly, we deny LTD’s and Starlink’s long-form applications, and both are in default on all winning bids not already announced as defaulted” (including the 7,849 census blocks it had won in Washington).<sup>2</sup>

On September 9, 2022, Starlink Services, LLC filed an “Application for Review of Starlink Services, LLC.”<sup>3</sup> On December 12, 2023, the FCC affirmed the WCB and OEA’s decision, denying approval of Starlink’s Long Form Application.<sup>4</sup> On February 16, 2024, the Company

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<sup>1</sup> See also, UTC Staff Memo and Attachment in Docket UT-210059, dated May 20, 2021.

<sup>2</sup> May 10, 2022, FCC Public Notice (page 8 under *Defaults*) and Attachment B (page 8 of 14) [11th RDOF Ready to Authorize Public Notice/Bid Defaults | Federal Communications Commission \(fcc.gov\)](https://www.fcc.gov/11th-RDOF-Ready-to-Authorize-Public-Notice-Bid-Defaults-Federal-Communications-Commission-fcc.gov)

<sup>3</sup> See “Starlink Services LLC RDOF AFR – For Public Inspection.pdf” – <https://www.fcc.gov/ecfs/search/search-filings/filing/10909050172096>.

<sup>4</sup> See “FCC-23-105A1.pdf” - <https://www.fcc.gov/ecfs/search/search-filings/filing/12120744701403>.

filed a petition to relinquish its ETC designation in Washington (Relinquishment Petition) in Docket UT-210059.

Discussion:

Commission Staff has reviewed the FCC documents and the Relinquishment Petition. This Relinquishment Petition is consistent with the WCB and OEA's decision, affirmed by the FCC, to deny the approval of Starlink's Long Form Application. Staff believes granting the request is in public interest.<sup>5</sup>

The Company is not only requesting to relinquish its ETC designation consistent with the FCC's current decision; but also seeks to cancel its telecommunications registration in Docket UT-240148 with the Commission because the Company no longer intends to operate as a telecommunications company in Washington state. Commission Staff agrees that cancellation of registration is also appropriate.

Conclusion:

Commission Staff recommends that the Commission, enter Order 02 granting Starlink's requested relinquishment of its Eligible Telecommunications Carrier (ETC) designation, effective April 12, 2024, in Docket UT-210059; and allow the Company's voluntary cancellation of telecommunications registration, also effective April 12, 2024, in Docket UT-240148.

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<sup>5</sup> 47 U.S.C. § 214 (e)(4) permits an ETC to seek to relinquish its designation where an area is served by another ETC or where existing customers will continue to be served. Starlink has never received universal services support and has no customers.