

**COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:)	
)	
Electronic Application of)	Case No. 2024-00254
Starlink Services, LLC to)	
Relinquish its Eligible)	
Telecommunications Carrier Designation)	

**APPLICATION OF STARLINK SERVICES, LLC TO RELINQUISH
ELIGIBLE TELECOMMUNICATIONS CARRIER DESIGNATION**

In accordance with 47 U.S.C. § 214(e)(4), Federal Communications Commission (“*FCC*”) Rule 54.205, and KAR 5:001, Starlink Services, LLC (“*Starlink*” or the “*Company*”), by counsel, respectfully submits this application to the Kentucky Public Service Commission (the “*Commission*”) requesting an Order confirming the Company’s relinquishment of its eligible telecommunications carrier (“*ETC*”) designation in Kentucky (the “*Application*”). In support of the Application, the Company states as follows.

I. BACKGROUND

1. Starlink Services, LLC is a wholly owned subsidiary of Space Exploration Technologies Corp., a Texas Corporation with its principal place of business at 1 Rocket Road, Hawthorne, CA 90250. The Company is a communications services provider that offers satellite broadband and stand-alone voice services. Pursuant to Commission Order, the Company received ETC designation for the purpose of providing high-speed broadband internet access, interconnected VoIP, and Lifeline service to customers in Kentucky.¹ To date, the Company has received no

¹ See Case No. 2021-00408, *Electronic Application of Starlink Services, LLC for Designation as an Eligible Telecommunications Carrier for Purposes of Receiving Rural Digital Opportunities Fund Support*, Order (Ky. PSC Apr. 8, 2021).

universal services support, nor has it provided broadband, voice, or other telecommunications services in the Commonwealth.²

2. As the Commission is aware, the Company participated in Phase 1 of the Rural Digital Opportunity Fund (“RDOF”) Auction and was designated as a winning bidder of \$8,483,592.00 for census block groups (“CBGs”) in Kentucky, as identified in Exhibit 1. To the best of Starlink’s knowledge, all of the CBGs are served by other ETC-designated and incumbent local exchange carrier providers.

3. To receive RDOF support, the FCC required the Company (and other RDOF winning bidders) to secure designation as an ETC in the areas where it was identified as a winning bidder in the RDOF proceeding. This Commission subsequently designated the Starlink as an ETC in its Order issued on April 8, 2021.

4. Although Starlink had plans to begin providing broadband and telecommunications services to Kentucky as soon as feasible, these plans were frustrated by subsequent developments at the FCC. Subsequent to its award of funds, the Company’s “Long Form” application was rejected by the Wireline Competition Bureau (the “Bureau”).³ Although Starlink appealed the Bureau’s decision, the Bureau’s decision was affirmed by the FCC late last year.⁴

5. Because Starlink never received its awarded RDOF support for the awarded Kentucky CBGs, does not currently provide telecommunications services in Kentucky, and will not be providing service in these geographic areas pursuant to any RDOF obligations, there is no longer a need for the Company to hold any ETC designation in Kentucky. Accordingly, the

² Starlink Services, LLC is unrelated to Starlink-branded broadband service, an unregulated broadband service provided by Space Exploration Technologies Corp. This application will have no impact on that service or its subscribers.

³ See *Rural Digital Opportunity Fund Auction Support for 80 Winning Bids Ready to Be Authorized, Bid Defaults Announced*, AU Docket No. 20-35 et al., Public Notice, DA 22-848, at 8-11 (WCB/OEA Aug. 10, 2022).

⁴ See *Application for Review of Starlink Services, LLC*, WC Docket No. 10-90 (filed Sept. 9, 2022); *Order on Review*, WC Docket, No. 10-90 et. al. (FCC, Dec. 12, 2023).

Company files this Application to relinquish its ETC designation in all CBGs in Kentucky where the Company has been designated as an ETC.

II. LEGAL STANDARD

6. Federal law provides an objective standard for ETC relinquishment, pursuant to which a state commission “shall permit” an ETC to relinquish its ETC designation “in any area” so long as that area is served by more than one ETC and the ETC “give[s] advance notice to the state commission of such relinquishment.”⁵ The FCC’s rules further provide that each state commission shall permit the ETC to relinquish its designation upon a determination that: (i) federally supported services will continue to be provided to any affected customers by another ETC, and (ii) sufficient notice of relinquishment has been provided to permit the purchase or construction of adequate facilities by any remaining ETCs in the ETC-designated area.⁶ As described further below, the Company meets the established standard for ETC relinquishment.

III. APPLICATION

7. The Company hereby requests that the Commission relinquish its ETC designation in the state of Kentucky because the Company will not receive RDOF support in Kentucky and will therefore not be providing any RDOF-supported services in Kentucky. As such, the original purpose for which the Company sought an ETC designation from the Commission has changed, and ETC designation is no longer necessary. The Company emphasizes that Kentucky residents will not be impacted by the Commission’s decision to grant its Application because the Company has never and currently does not serve any Kentucky customers pursuant to its ETC designation.⁷ Public records

⁵ 47 U.S.C. § 214(e)(4); 47 C.F.R. § 54.205(a).

⁶ 47 C.F.R. § 54.205(b).

⁷ See Case No. 2020-00415 *Application of T-Mobile Central LLC and PowerTel/Memphis, Inc.*, Order (Ky. P.S.C. Feb. 16, 2021). Regulatory agencies in other jurisdictions have found that Starlink has no duty to show that federally supported services will be provided to its customers, because the company never served any customers. See *Petition of Starlink Services, LLC for Designation as an Eligible Telecommunications Carrier*, D.T.C. 21-1, Order (Mass. D.T.C. June 12, 2024) at 3.

indicate that other ETCs operate in the geographic regions where Starlink is designated as an ETC.⁸ Finally, because Starlink does not serve any customers in Kentucky, there are no issues regarding adequate notice.

IV. CONCLUSION

The Company respectfully requests that the Commission approve this Application and granting the following relief:

- (a) A Final Order confirming the Company's relinquishment of its ETC designation in all geographic areas of Kentucky;
- (b) Relief from any ongoing duties or obligations associated with the relinquished ETC designation;
- (c) All other relief to which the Company may be entitled.

This 16th day of August, 2024.

Respectfully submitted,

/s/ Edward T. Depp
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⁸ ETCs available in each service territory can be found by using the "Companies Near Me" search tool available on the Universal Service Administrative Company ("USAC") website at <https://cnm.universalservice.org/>.

Certification

I hereby certify that a copy of this filing has been served electronically on all parties of record through the use of the Commission's electronic filing system, and there are currently no parties that the Commission has excused from participation by electronic means. Pursuant to the Commission's July 22, 2021 Order in Case No. 2020-00085, a paper copy of this filing has not been transmitted to the Commission.

/s/ Edward T. Depp
Counsel to Starlink Services, LLC

Verification

I, Aishani Shukla, Regulatory Analyst for Starlink Services, LLC, state that I have read the foregoing application and its exhibits, and the statements contained in the application and exhibits are true and correct to the best of my knowledge, information, and belief.

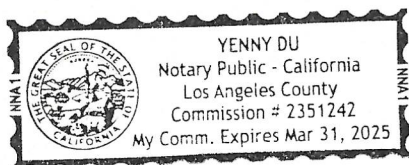
Aishani Shukla
Regulatory Analyst

Date: 8/15/24

State of California)
)
County of Los Angeles)

Subscribed, sworn to, and acknowledged this 15th of August, 2024, before me, a Notary Public, in and before said County and State.

My Commission expires: March 31, 2025



[Signature]
Notary Public

Exhibit 1

Service Area

Proposed ETC Service Area (Census Blocks)

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