

**DESCRIPTION OF THE TRANSACTION
AND PUBLIC INTEREST STATEMENT**

SUMMARY

By leveraging the world's largest and only satellite-to-mobile constellation combined with a portfolio of nationwide 800 MHz licenses of up to 14 megahertz of paired, low-band spectrum, Starlink Mobile can ensure all Americans have access to high-speed mobile broadband no matter where they go. Acquiring this low-band spectrum is a critical next step in ensuring that Starlink Mobile will bring much-needed innovation to the wireless market by providing quality high-speed service anywhere, including in remote and urban environments as well as in buildings. SpaceX will make use of these licenses through a flexible, hybrid architecture that ensures Starlink Mobile is the only network capable of delivering terrestrial broadband, satellite service, or both—connecting to standard consumer devices and closing coverage gaps nationwide. Once approved, SpaceX will deploy rapidly so that American consumers can enjoy the benefits of these long-underused spectrum assets.

As the Commission recognized when authorizing the transfer of this spectrum from T-Mobile, these 800 MHz licenses are a valuable source of underused paired, broadband-ready, low-band spectrum. SpaceX will fulfill the Commission's vision by finally putting this spectrum to productive use—rapidly and intensively—deploying a nationwide coverage layer that complements its satellite service to deliver meaningful, reliable connectivity to underserved communities and mobile dead zones.

SpaceX's acquisition of these critical low-band licenses will enhance competition by putting valuable 800 MHz spectrum in the hands of a company that has demonstrated an ability and commitment to deploying spectrum to serve the American people at a blistering pace unmatched in the satellite or mobile industry. By approving this transaction, the Commission can finally put these frequencies to work providing advanced services to American consumers.

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By enabling Starlink Mobile to finally put this valuable low-band spectrum to use, the proposed license transfers will supercharge competition in the mobile market by ensuring all Americans have access to high-speed mobile broadband anywhere they go. The Applicants seek expedited grant of the transfer to enable SpaceX to move at its proven and unparalleled pace to enhance its flexible, hybrid architecture across the country.¹

I. DESCRIPTION OF THE APPLICANTS AND THEIR QUALIFICATIONS

A. Space Explorations Technologies Corp. and Starlink Spectrum Holdings, LLC

SpaceX is a publicly traded Texas corporation founded by Elon Musk in 2002 to revolutionize space technologies, with the ultimate goal of enabling humanity to become a multi-planetary species. The company designs, manufactures, and launches advanced rockets and spacecraft. In furtherance of that objective, SpaceX today operates three primary businesses: a space launch business; a global satellite network providing broadband and direct-to-device connectivity; and an AI compute business that deploys high-performance computing in space. SpaceX's satellite business designs, manufactures, launches, and operates advanced communications satellites. This business includes Starlink, the world's most advanced satellite-based broadband service. Starlink uses a low-Earth orbit satellite constellation—already the world's largest at more than 11,000 satellites and counting—and ground infrastructure around the globe to deliver low-latency, high-speed broadband capable of supporting Internet access, streaming, video calls, and more, as well as service directly to user handsets. Starlink serves more than 12 million customers across more than 170 countries as of mid-2026.

¹ By this application (the "Application") and pursuant to Section 310(d) of the Communications Act of 1934, as amended, NewLevel IV, L.P. ("NewLevel"), Starlink Spectrum Holdings, LLC, and Space Exploration Technologies Corp., ("SpaceX" and, collectively with NewLevel, the "Applicants") request Commission consent to the transfer of control of NewLevel's 800 MHz wireless licenses to SpaceX (collectively the "Transaction").

The Commission has repeatedly found that SpaceX is qualified to hold Commission licenses. SpaceX and its wholly owned subsidiaries, Space Exploration Holdings, LLC and SpaceX Services, Inc., currently hold multiple space station licenses, earth station licenses, private land mobile radio licenses, and experimental licenses. Starlink Spectrum Holdings, LLC (“Starlink Mobile”) is a wholly owned subsidiary of SpaceX that will receive the wireless spectrum licenses being transferred in the Transaction. Form 602s providing current ownership information for the transferees of the licenses covered by this application are on file with the Commission.²

B. Grain Management, LLC and NewLevel IV, L.P.

Grain Management, LLC (“Grain Management”) is a leading investment firm specializing in digital infrastructure. Grain Management is a global organization with expertise in managing investments that span the digital communications landscape in the U.S. and abroad. For example, Grain Management has invested in several U.S. companies, including Network Wireless Solutions, LightRiver Technologies, Great Plains Communications, Ritter Communications, and Phoenix Tower International, to target key areas of telecommunications infrastructure and accelerate and expand the provision of services in the telecommunications sector. David Grain, the founder and CEO of Grain Management, has had a longstanding interest in acquiring wireless licenses, having raised and deployed the necessary capital to successfully acquire such licenses via Commission spectrum auctions and the secondary market. The Commission has repeatedly found that Grain Management and its subsidiaries and affiliated investment funds have the requisite character and qualifications to hold Commission

² See ULS File Nos. 0012212189 (for Space Exploration Technologies Corp.) and 0012212191 (for Starlink Spectrum Holdings, LLC).

authorizations.³

NewLevel IV, L.P. (“NewLevel”), a Delaware limited partnership wholly owned by an affiliate of Grain Management, owns all of the issued and outstanding limited liability company interests in Prism License Co. 1 LLC (“Prism 1”) and Prism License Co. 2 LLC (“Prism 2”), which together hold all of the 800 MHz licenses to be transferred in the Transaction.

II. DESCRIPTION OF THE TRANSACTION

As described below, pursuant to a Purchase and Sale Agreement dated October 8, 2026, the Transaction proposes to transfer control of 800 MHz radio licenses (“800 MHz Licenses”) held by Prism 1 and Prism 2 from NewLevel to Starlink Mobile, which will directly hold the companies that currently hold the wireless spectrum licenses being transferred in the Transaction. The 800 MHz Licenses to be transferred are specified in the attached Schedule A.

III. STANDARD OF REVIEW

The Commission will approve a proposed license transfer of control under the Communications Act if it concludes that the transfer will serve “the public interest, convenience, and necessity.”⁴ In making this determination, the Commission first assesses whether the proposed transaction complies with the specific provisions of the Act, other applicable statutes, and the Commission’s rules.⁵ If so, it then proceeds to “determining whether the transfer of licenses serves the broader public interest,” including whether “the merger will affect the quality of communications services or will result in the provision of new or additional services to

³ See, e.g., ULS File Nos. 0011483083 (approving NewLevel, LLC’s acquisition of 600 MHz licenses) and 0009444835 (approving NewLevel II, L.P.’s acquisition of 3.7 GHz licenses).

⁴ 47 U.S.C. § 310(d); *AT&T Inc. and DIRECTV, Memorandum Opinion and Order*, 30 FCC Rcd. 9131 ¶ 2 (2015) (“*AT&T-DIRECTV Order*”)

⁵ See *Proposed Transfer of Control of Tracfone Wireless, Inc. to Verizon Commc’ns Inc.*, Memorandum Opinion and Order, 36 FCC Rcd. 16994 ¶ 21 (2021) (“*Verizon-TracFone Order*”).

consumers.”⁶ In doing so, the Commission “employs a balancing process, weighing any potential public interest benefits of the proposed transaction against any potential public interest harms.”⁷ Applicants bear the burden of demonstrating that the proposed transaction, on balance, serves the public interest.⁸ Notably, “the Commission has long recognized the clear public interest benefits in a license or authorization holder being able to assign or transfer control of its license or authorization freely.”⁹

The Commission’s competition analysis, which forms an important part of the public interest evaluation, is “informed by, but not limited to,” antitrust principles.¹⁰ The Commission has repeatedly noted that its public interest standard is broader than the Department of Justice’s (“DOJ”) review, and that it may consider “whether a transaction would enhance, rather than merely preserve” existing competition.¹¹ In making its public interest determination, the Commission will also consider whether the transaction would bolster the deployment of

⁶ *EchoStar Commc’ns Corp.*, Hearing Designation Order, 17 FCC Rcd. 20559 ¶¶ 26-27 (2002).

⁷ *Consent to Transfer Control and Assign Licenses to Nexstar Media Grp., Inc. and Associated Divestiture License Assignments*, Memorandum Opinion and Order, 32 FCC Rcd. 183, ¶ 19 (2017). In evaluating the competitive effects of a transaction, the Commission will look beyond a particular delivery technology to competitors that offer substitute services using other technologies. *See Applications for Consent to Transfer Control of Licensee, XM Satellite Radio Holdings Inc., Transferor to Sirius Satellite Radio Inc., Transferee*, Memorandum Opinion and Order, 26 FCC Rcd. 10539 ¶ 7 (2011) (declining to extend the price cap imposed as a condition of the Sirius/XM merger because “the marketplace has evolved since the merger closed, and consumers now have additional audio entertainment choices. . . . [S]ince the Merger Order new audio services have emerged as viable consumer alternatives, including smartphone Internet streaming applications that can be used in mobile environments such as automobiles equipped with user-friendly interfaces.”); *Modernizing Unbundling and Resale Requirements in an Era of Next-Generation Networks and Services*, Report and Order, 35 FCC Rcd. 12425 ¶¶ 2–3 (2020) (“[T]he telecommunications marketplace has transformed from a marketplace dominated by monopolies to a marketplace characterized by competition and technological innovation” in part due to the “1996 [Telecommunications] Act’s goal of robust intermodal competition benefiting all Americans.”).

⁸ *See e.g., AT&T-DIRECTV Order* ¶ 18 (“The Applicants bear the burden of proving, by a preponderance of the evidence, that the proposed transaction, on balance, serves the public interest.”).

⁹ *Applications Filed for the Transfer of Control of Authorizations Held by Frontier Commc’ns Corp., Debtor-in-Possession and its Wholly-Owned Subsidiaries*, Memorandum Opinion and Order and Declaratory Ruling, 36 FCC Rcd. 291 ¶ 11 & n.45 (2021).

¹⁰ *See id.* ¶¶ 20–21 (citing 15 U.S.C. § 18).

¹¹ *See, e.g., Applications of Viasat, Inc. and Connect TopCo Ltd.*, Memorandum Opinion and Order and Declaratory Ruling, 38 FCC Rcd. 4776, ¶ 12 (2023) (“*Viasat-Inmarsat Order*”); *Verizon-TracFone Order* ¶ 23.

advanced services,¹² affect the quality of communications services, or result in the provision of new or additional services to consumers.¹³ During its analysis, the Commission also considers technological and market changes, as well as the nature, complexity, and speed of change within the communications industry.¹⁴

Only transaction-specific benefits and harms are cognizable. A transfer of control proceeding is not the proper forum for addressing general industry issues that are not specific to the transaction.¹⁵ In addition, the Commission “may not consider whether the public interest, convenience, and necessity might be served by” a transaction involving an entity “other than the proposed transferee.”¹⁶

IV. THE TRANSACTION WILL FINALLY PUT VALUABLE SPECTRUM TO PRODUCTIVE USE, TO THE BENEFIT OF THE AMERICAN PUBLIC

The 800 MHz Licenses played an important role in mobile networks during the rise of 2G networks. Nextel successfully amassed the spectrum into a near-national footprint, and the 800 MHz Licenses enabled Nextel to offer a competitive wireless voice service. But through a series of transactions, this otherwise valuable spectrum was used less and less as it

¹² See *Viasat-Inmarsat Order* ¶ 11 n.44 (citing 47 U.S.C. §§ 254, 332(c)(7), 1302; Telecommunications Act of 1996, Preamble, Pub. L. No. 104-104, 110 Stat. 56 (1996) (one purpose of the Act is to “accelerate rapidly private sector deployment of advanced telecommunications and information technologies and services”)).

¹³ See, e.g., *id.* ¶ 11; *Verizon-TracFone Order* ¶ 22; *AT&T-DIRECTV Order* ¶ 19.

¹⁴ See, e.g., *Verizon-TracFone Order* ¶ 22.

¹⁵ See, e.g., *Applications of SoftBank Corp., Starburst II, Inc., Sprint Nextel Corp., and Clearwire Corp. for Consent to Transfer Control of Licenses and Authorizations*, Memorandum Opinion and Order, Declaratory Ruling, and Order on Reconsideration, 28 FCC Rcd. 9642 ¶ 74 (2013); *Applications of Cellco P’ship d/b/a Verizon Wireless and SpectrumCo LLC and Cox TMI, LLC for Consent to Assign AWS-1 Licenses*, Memorandum Opinion and Order and Declaratory Ruling, 27 FCC Rcd. 10698, ¶ 94 (2012); *Application of AT&T Inc. and Qualcomm Incorporated for Consent to Assign Licenses and Authorizations*, Order, 26 FCC Rcd. 17589 ¶ 79 (2011); *Applications of AT&T and Centennial Commc’ns Corp. for Consent to Transfer Control of Licenses, Authorizations and Spectrum Leasing Arrangements*, Memorandum Opinion and Order, 24 FCC Rcd. 13915 ¶ 141 (2009) (“*AT&T-Centennial Order*”); *AT&T Inc. and BellSouth Corp. Application for Transfer of Control*, Memorandum Opinion and Order, 22 FCC Rcd. 5662 ¶ 56 n.154 (2007).

¹⁶ 47 U.S.C. § 310(d).

eventually landed with T-Mobile.¹⁷ But now, SpaceX stands ready to make rapid and substantial investments to accelerate these licenses into a new foundational nationwide coverage band for next-generation hybrid connectivity and leverage their superior long-range propagation characteristics and highly effective building penetration.

A. The Commission Established Flexible, Technology Neutral Buildout Standards for the 800 MHz Licenses

In approving Grain Management’s acquisition of the 800 MHz Licenses, the *Grain Approval Order* conditioned waiver relief on performance requirements that could be satisfied on a license-by-license basis through terrestrial broadband service, direct-to-device satellite service, or a subsequent election between those technologies in a given license area.¹⁸ The terrestrial benchmarks are the default, and the satellite benchmarks become available under specific conditions present here.

Under the baseline terrestrial benchmarks, reliable broadband signal coverage and service—service of at least 5/5 MHz LTE based on 3GPP Release 8 or later—must be provided to at least 33 percent of the population or 25 percent of the geography of each license by July 1, 2029, and to at least 66 percent of the population or 50 percent of the geography by July 1, 2034.

Where, as here, Grain Management follows a Commission-overseen process to select a satellite partner, a subsequent transferee also has the option to meet alternative direct-to-device performance requirements, all of which follow the precedent set in the *SpaceX/EchoStar Order*.¹⁹

¹⁷ See *Application of NewLevel, LLC and Nextel West Corp. for Assignment of Certain Licenses and Authorizations*, Universal Licensing System (ULS) File No. 0011483054 (lead) (filed Mar. 17, 2025), amended Mar. 25, 2025, amended Mar. 28, 2025, amended Apr. 21, 2025, amended Apr. 29, 2025, Description of Transaction and Public Interest Statement, p.2 (“*T-Mobile Grain Application*”).

¹⁸ *Grain Approval Order* ¶ 45 (“We require that if Grain provides or supports terrestrial service on the 800 MHz licenses, it must provide a broadband service, as defined in the context of the Commission’s 900 MHz broadband rules. Similarly, if Grain provides or supports D2D service, then the provision of D2D must be a meaningful, two-way service.”).

¹⁹ See *Applications of Spectrum Business Trust 2025-1, Space Exploration Technologies Corp., and EchoStar*

These innovative milestones drive deployment that can be easily verified using straightforward measurements. The technology-neutral performance requirements improve upon the outdated traditional milestones long used for satellite and terrestrial networks by letting the market decide how best to use the spectrum to serve American consumers. The *Grain Approval Order* also provides that a licensee that satisfies one path's interim metrics may thereafter elect the other technology for that license without the interim-failure penalty, confirming that the buyer may choose, in each license area, the technology by which the applicable buildout requirements will be met.²⁰

B. Starlink Mobile's Flexible, Hybrid Architecture Will Leverage Both Terrestrial and Satellite Technology to Ensure All Americans Have High Speed Mobile Broadband, Whether in Rural or Urban Areas, Indoor and Out

SpaceX is optimally positioned to put the 800 MHz Licenses to use “in a rapid and meaningful way” as contemplated in the *Grain Approval Order*.²¹ The 800 MHz Licenses are deployment-ready for terrestrial mobile broadband and no further Commission action is needed.

Consistent with the construct in the *Grain Approval Order*,²² SpaceX is also filing an application with the Space Bureau to modify its recently granted authorization²³ for authority for

Corporation for Consent to Assign Spectrum and Earth Station Licenses, GN Docket No. 25-302, Memorandum Opinion and Order, DA 26-471 (WTB/SB May 12, 2026) (“*SpaceX-EchoStar Approval Order*”). First interim benchmark of November 30, 2029 (downlink SINR of 5 dB with service availability of 70 percent of the time over 90 percent of each license area; fifth-percentile uplink throughput of at least 100 kbps/MHz over 90 percent of the area at 70 percent availability; and spectral efficiency of 300 kbps/MHz/beam downlink and 100 kbps/MHz/beam uplink); a second interim benchmark of November 30, 2031 (SINR of 5 dB, 80 percent temporal availability over 90 percent of the area, and uplink throughput of at least 200 kbps/MHz); and a final benchmark of November 30, 2036 (SINR of 10 dB, 90 percent temporal availability over 90 percent of the area, uplink throughput of at least 300 kbps/MHz, and spectral efficiency of 600 kbps/MHz/beam downlink and 200 kbps/MHz/beam uplink).

²⁰ *Grain Approval Order* ¶ 48.

²¹ *Id.* ¶ 2.

²² *Id.* ¶ 48 (“If Grain meets the Satellite Partner Selection Requirements set forth above to select a satellite partner and causes complete and fully supported application(s) for secondary satellite license to be filed by December 4, 2026, the construction requirements can be fulfilled on a license-by-license basis by providing satellite service consistent with the benchmarks below.”).

²³ Space Exploration Holdings, LLC, Application for Authority to Launch and Operate the SpaceX NGSO MSS

its next-generation Starlink Mobile satellite constellation. The frequencies associated with the 800 MHz Licenses will be added to the list of other frequencies authorized for Supplemental Coverage from Space. This next-generation constellation of Starlink Mobile satellites has been designed to fully use a wide variety of frequencies to enable it to serve many different global markets. Driven by custom SpaceX-designed silicon and phased array antennas, the satellites support thousands of spatial beams and higher bandwidth capability. With the world's most advanced phased arrays, wide bandwidth operations, and optimized mobile protocols, the system supports an overall capacity increase of more than a hundred times the first-generation Starlink Mobile system.

C. SpaceX's Demonstrated Track Record of Unprecedented Deployments to Serve American Consumers

SpaceX's track record demonstrates its ability to rapidly deploy a system to use this valuable spectrum. For example, the Commission granted SpaceX authority to launch and operate its Gen1 broadband system in March 2018. While other operators routinely ask for extensions of their deployment requirements, SpaceX met its first milestone nearly a year and a half early.²⁴ Now that SpaceX has further refined its process for designing, constructing, and launching its satellites, it has shown even more rapid deployment capabilities—deploying over 3,100 satellites over just the last year. And after receiving operational authority for its Starlink Mobile system in November 2024, SpaceX began public beta tests in February 2025 and launched commercial service in July 2025.²⁵

System, Authorization and Order, DA 26-1078, GN Docket No. 25-340, ICFS File Nos. SAT-LOA-20250916-00282, SAT-AMD-20251125-00339 (SB, WTB rel. Oct. 6, 2026).

²⁴ See *Space Exploration Holdings, LLC, Application for Approval for Orbital Deployment and Operating Authority for the SpaceX NGSO Satellite System*, Memorandum Opinion, Order and Authorization, 33 FCC Rcd. 3391 ¶ 42(b) (2018) (establishing March 29, 2024, as first milestone date); Satellite Policy Branch Information, Public Notice, 37 FCC Rcd. 10214 (2022) (finding SpaceX had satisfied its first milestone).

²⁵ See *Space Exploration Holdings, LLC Request for Deployment and Operating Authority for the SpaceX Gen2*

Building the constellation to its present form with its unique regenerative architecture involved designing, manufacturing, launching and operating cell towers in space, including development of the system’s eNodeB payload, phased array antennas, and core network, which enables network integration. SpaceX also worked with leading device manufacturers and application developers to enhance the services provided over the satellite network. SpaceX’s track record shows that it is uniquely qualified to rapidly deliver advanced services across the United States using the 800 MHz band.

D. SpaceX’s Deployment Plans for the 800 MHz Licenses

The Commission made clear in the *Grain Approval Order* that the 800 MHz Licenses must be put to robust, real use but wisely did not dictate the technology or architecture to satisfy that goal. Instead, the Commission adopted “technologically flexible conditions to allow for a terrestrial, D2D, or future hybrid terrestrial- and satellite-based network,” required meaningful broadband if the licensee provides terrestrial service and meaningful two-way service if it provides satellite service, and built in the ability to meet interim milestones under one technology and later elect the other.²⁶ How best to deploy, and how best to meet the construction deadlines, was left to the licensee—so long as the spectrum is actually used. Transferring control of these licenses to SpaceX carries that design into effect: it places them with an operator that can satisfy either set of benchmarks and that will put every license to productive use.

For terrestrial deployments, SpaceX plans to operate standards-based advanced wireless equipment. Deployment will rely on radios feeding sectorized antennas on towers, rooftops, and

NGSO Satellite System, Order and Authorization, 39 FCC Rcd. 12550 (2024) (granting SCS authority); Mike Robuck, T-Mobile US launches Starlink D2D public beta, MOBILE WORLD LIVE (Feb. 10, 2025), <https://www.mobileworldlive.com/t-mobile-us/embargoed-t-mobile-us-launches-starlink-d2d-beta/>.

²⁶ *Grain Approval Order* ¶ 44.

other structures, configured to provide reliable signal coverage and meaningful broadband service. The propagation characteristics of 800 MHz (long-range coverage, strong performance against terrain and clutter, and superior building penetration) make this paired low-band spectrum an efficient coverage layer for markets of all sizes and densities, including areas where higher-frequency networks cannot serve. SpaceX will engineer this overlay to meet the *Grain Approval Order*'s construction benchmarks.

V. THE TRANSACTION DOES NOT VIOLATE THE ACT OR ANY COMMISSION RULE OR POLICY

The Commission has found numerous times that SpaceX and its subsidiaries are legally, technically, and otherwise qualified to hold spectrum licenses. SpaceX complies with all limitations on foreign ownership under Section 310 of the Communications Act.²⁷ SpaceX obviously has the financial resources and demonstrated capacity to design, deploy, and operate advanced communications satellites and terrestrial infrastructure at a rapid pace to deliver highly capable services to American consumers.

The Transaction also would not violate any Commission limitation on cross-ownership or even trigger any of the Commission's "screens" for spectrum aggregation.²⁸ Today, the 800 MHz Licenses are not being used to support any competitive wireless services. As demonstrated in Exhibit B, the addition of up to 14 MHz of 800 MHz spectrum will not result in SpaceX even

²⁷ 47 U.S.C. § 310(d).

²⁸ See, e.g., *Applications of SoftBank Corp., Starburst II, Inc., Sprint Nextel Corp., and Clearwire Corp. for Consent to Transfer Control of Licenses and Authorizations*, Memorandum Opinion and Order, Declaratory Ruling, and Order on Reconsideration, 28 FCC Rcd. 9642 ¶ 74 (2013); *Applications of Cellco P'ship d/b/a Verizon Wireless and SpectrumCo LLC and Cox TMI, LLC for Consent to Assign AWS-1 Licenses*, Memorandum Opinion and Order and Declaratory Ruling, 27 FCC Rcd. 10698, ¶ 94 (2012); *Application of AT&T Inc. and Qualcomm Incorporated for Consent to Assign Licenses and Authorizations*, Order, 26 FCC Rcd. 17589 ¶ 79 (2011); *Applications of AT&T and Centennial Commc'ns Corp. for Consent to Transfer Control of Licenses, Authorizations and Spectrum Leasing Arrangements*, Memorandum Opinion and Order, 24 FCC Rcd. 13915 ¶ 141 (2009) ("AT&T-Centennial Order"); *AT&T Inc. and BellSouth Corp. Application for Transfer of Control*, Memorandum Opinion and Order, 22 FCC Rcd. 5662 ¶ 56 n.154 (2007).

approaching an applicable screen threshold, much less exceeding it.²⁹ SpaceX's acquisition of the 800 MHz Licenses will produce a new nationwide coverage layer operating as a flexible, hybrid service, deployed by a company uniquely capable of bringing advanced services to the American public. Accordingly, the Transaction will increase competition in the mobile services market.

VI. CONCLUSION

The Commission has been striving to make productive use of these valuable 800 MHz Licenses for at least a decade. This Transaction will achieve that long-sought goal, following the procedure envisioned by the Commission. Accordingly, the Applicants request that the Commission grant the Applications expeditiously so that they can begin the process of connecting all Americans to a first-of-its-kind cutting-edge hybrid mobile network no matter where they are as soon as possible.

²⁹ "The trigger is currently 385 megahertz" and the maximum attributable post-transaction to SpaceX in any local market would be 89 megahertz with no more than 14 megahertz below 1 GHz, "suggesting that the spectrum transfer does not raise any competitive concerns." *SpaceX/EchoStar Order* ¶ 33.