



March 3, 2021

Holly R. Anderson
Clerk of the Vermont Public Utility Commission
112 State Street
Montpelier, VT 05620-2701

Via Electronic Filing

RE: *Supplement to Starlink Services, LLC Application for Designation as an Eligible Telecommunications Carrier for Purposes of Receiving Rural Digital Opportunities Fund Support, Docket No. 21-0018-PET*

Dear Ms. Anderson:

Starlink Services, LLC ("Starlink Services") hereby submits comments responding to the comments and pre-filed testimony of the Vermont Department of Public Service filed on February 9, 2021 as requested by in the Memorandum Requesting Comments issued on February 16, 2021.

Respectfully Submitted,

/s/ R. Edward Price

R. Edward Price
Senior Counsel
SPACE EXPLORATION TECHNOLOGIES CORP.
PARENT COMPANY OF STARLINK SERVICES, LLC
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BEFORE THE VERMONT PUBLIC UTILITY COMMISSION

In the Matter of the Application of	)	
Starlink Services, LLC for Designation	)	
as an Eligible Telecommunications Carrier	)	Case No. 21-0018-PET
for Purposes of Receiving Rural Digital	)	
Opportunities Fund Support	)	

**STARLINK SERVICES, LLC RESPONSE TO DEPARTMENT OF PUBLIC SERVICE
COMMENTS**

Starlink Services, LLC (“Starlink Services”) hereby responds to the comments and pre-filed testimony of the Vermont Department of Public Service (the “Department”) filed in Case No. 21-0018-PET on February 9, 2021.

If designated an Eligible Telecommunications Carrier (“ETC”), Starlink Services agrees to comply with the conditions proposed by the Department on February 9, 2021. Specifically, Starlink Services agrees to:

- File with the Vermont Public Utility Commission (“the Commission”) and the Department any and all deployment milestone reports filed with the Federal Communications Commissions (“FCC”) during the RDOF support term, which shall include the number of locations served with stand-alone voice in the applicable RDOF Census Block.
- File within 60 days of any order granting the company ETC status a marketing plan that describes the marketing and outreach efforts Starlink will use in advertising the availability of the required services and explain how it will be effective in reaching eligible consumers. The marketing plan will specifically describe:
 - Whether information about the required services is clearly displayed on the Starlink or SpaceX website, as applicable;
 - Starlink’s use of multiple outreach methods;
 - The frequency of its outreach efforts;
 - Whether Starlink will provide outreach materials to relevant community institutions;
 - Whether it will advertise in multiple languages if appropriate;

- o The use of clear and plain language when describing the required services; and
- o Possible cooperation with other ETCs for the joint production, placement and use of outreach materials.

Starlink Services thanks the Department for its in-depth analysis of its ETC application and looks forward to working closely with the Department and the Commission in providing RDOF-supported services in Vermont.

Respectfully submitted,

STARLINK SERVICES, LLC

By: /s/ R. Edward Price
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