

13 December 2024

The Secretary  
Department of Infrastructure, Transport, Regional Development, Communications and the Arts  
Commonwealth Government of Australia

**RE: First Nations Community Wi-Fi Program  
Comments of Starlink Internet Services Pte. Ltd.**

Dear Sir/Madam

Starlink Internet Services Pte. Ltd. welcomes the opportunity to comment on the “First Nations Community Wi-Fi Program” discussion paper (**Discussion Paper**) issued by the Department of Infrastructure, Transport, Regional Development, Communications and the Arts (**Department**).

Below is a general overview of the Starlink global system and the services provided in Australia by Starlink Services Pte. Ltd. (collectively, **Starlink**), together with Starlink’s responses to each of the questions raised in the Discussion Paper.

## **Background on Starlink**

Starlink has been providing non-geostationary, low-earth orbit (**LEO**) satellite internet services to residential, commercial and government customers in Australia since late 2020. Today, just over four years later, Starlink’s network has close to 100% coverage in Australia and provides broadband connectivity for homes and offices, recreational vehicles, offshore and maritime vessels and private and commercial aircraft.

SpaceX has built from the ground up a successful low-earth orbit (LEO) satellite internet network that serves over four million customers throughout the world. The deployment of the Starlink network, which is privately funded and has been generating revenue since 2020, was and still is a very large and complex undertaking that requires technical, regulatory, and logistical expertise for successful execution. This deployment is and will continue to be an ongoing project for SpaceX, as the company continuously designs, manufactures, and deploys upgraded versions of hardware like satellites, gateway antennas, consumer premise equipment, as well as the software that enables and maximizes hardware efficacy. As a result, the quality of service will constantly improve over time as small and large changes are made, and the number of customers the network is able to service will increase as time passes. To the benefit of the end-users, the Starlink network expands in size and capability every week, resulting in a dynamic technology that is future-proof and evolves as the market demands.

Starlink provides a once-in-a-generation opportunity for Governments to close rural-urban internet disparities. SpaceX’s constellation of over 6,000 LEO satellites already provides high-speed internet nearly anywhere in the world. Starlink can immediately connect unserved areas for Governments—offering cost-savings and accelerating universal connectivity goals. As a global provider of internet

services to regions that until now have been unserved or underserved with high-speed broadband, Starlink is proud of our track-record of serving consumers in these areas. Starlink customer premises equipment, known as Starlink Kits, are simple to deploy, install and use, with no professional experience or formal training needed. Starlink's standard residential service plan in Australia has no data rate limits and provides the maximum speeds the network can provide at any given time (subject to standard network management practices). Our plans do not require a long-term contract, and service may be cancelled at any time by the customer. Moreover, the network is routinely upgraded without any need for changing/upgrading the Starlink Kit.

Starlink provides unlimited high-speed, low-latency internet through its Residential plan, which can be used by households to support multiple users simultaneously conducting voice and video calls, browsing the Internet, video streaming, gaming and accessing essential services such as government services, online banking and health services. For business and government use, Starlink also offers Priority service plans, which are higher tiers of service that can support over 200 users and are intended for high-demand use cases that require in-motion use, open ocean coverage, network priority and priority support features.

A description of the Starlink service plans currently offered in Australia can be found at <https://www.starlink.com/au/service-plans>.

Starlink supports the Department's efforts to close the gap in digital inclusion for Australia's First Nations people and communities. We have witnessed first-hand how access to high speed broadband enables essential online services such as education, telehealth, and civic engagement which are transformational for people's daily lives. Below, we provide a high-level overview of a successful community Wi-Fi program that could be a model for Australia's community Wi-Fi program for First Nations.

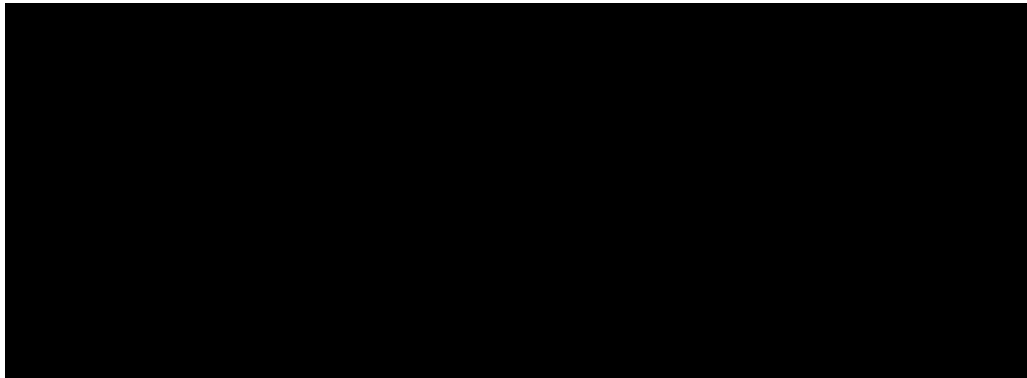
### **Starlink & Mexico's Internet para Todos Program**

The Mexican Government designed the *Internet para Todos* program to achieve 100% territorial connectivity by 2024. Through the Federal Electricity Commission ("CFE"), Mexico is deploying a network of free community wi-fi points and 4G mobile towers across the country's most remote areas. Together, CFE and SpaceX have connected millions of Mexican citizens where high-quality internet was previously unavailable:

- **Partial Starlink Award:** Through three local ISPs, Starlink was awarded 3,000 community wi-fi sites. SpaceX supplied the ISPs with Starlink kits and satellite capacity, while the ISPs provided on-site networking, installation, and customized reporting. Starlink and its partners installed all sites within weeks, resulting in an additional award of 2,000 sites for exceeding contract milestones and bringing the total Starlink sites to 5,000.
- **Full Award:** CFE streamlined legacy procurement requirements and increased minimum service metrics (80/10mbps). SpaceX designed a deployment plan to be fully managed by CFE. The optimized program enabled CFE to competitively award Starlink connectivity for 10,000 communities via their free Wi-Fi program. CFE also procured 2,000 Starlink satellite backhaul connections to install on top of cellular towers and rapidly expand rural mobile coverage. The direct contracting arrangement offered CFE cost savings, ensures smooth program execution, and increases CFE's technical capabilities for future programs. The partnership is structured to easily increase by thousands of sites, providing a simple and immediate solution should CFE require more connectivity.

- Execution: SpaceX delivered hardware for all 12,000 locations within 6 calendar days of receiving the CFE award.

*"[Starlink] is the fastest service in terms of data transfer, since there is no signal delay from the Earth to the satellites. The service is cutting-edge... and it has been contracted to be able to provide connectivity much more quickly to the entire country."* – Presidential Coordinator of the National Digital Strategy, Emiliano Calderón



Please let us know if you have any questions in relation to this submission. We would welcome the opportunity to meet with the Department to discuss the First Nations Community Wi-Fi Program and our experience with similar successful government connectivity projects.

Yours sincerely

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