



Federal Communications Commission
Washington, DC 20554

International Bureau

April 27, 2007

Elizabeth R. Park.
Latham & Watkins LLP
555 Eleventh Street, NW, Suite 100
Washington, DC 20004-1304

Re: ViaSat, Inc. Applications for Launch and Operating Authority for Satellites Operating in the Ka-Band Fixed Satellite Service, File Nos. SAT-LOA-20070209-00028, Call Sign S2732, and SAT-LOA-20070314-00051, Call Sign S2737

Dear Ms. Park:

This letter requests additional information regarding the above-captioned applications (“Applications”) that ViaSat, Inc. (“ViaSat”) filed on February 9 and March 14, 2007. The Applications are substantially similar and request that the Commission grant launch and operation authority for two new Ka-band Fixed Satellite Service (“FSS”) satellites to be located at the 115.2° W.L. (file no. SAT-LOA-20070209-00028) and 77.3° W.L. (file no. SAT-LOA-20070314-00051) orbital locations. Prior to further processing of the Applications, we seek supplemental information regarding an aspect of the orbital debris mitigation/end-of-life operations statements that ViaSat has provided.

In the Appendix A, Technical Annex, of each of the Applications, ViaSat says that “[a]t end-of-life and once the satellite has been placed into its final disposal orbit, all on-board sources of stored energy will be depleted or secured, and the batteries will be discharged.”¹ Section 25.114(d)(14)(ii) of the Commission’s rules sets forth an applicant’s reporting requirements regarding the assessment and probability of accidental explosions. Specifically, the rule requires:

[a] statement that the space station operator has assessed and limited the probability of accidental explosions during and after completion of mission operations. This statement must include a demonstration that debris generation will not result from the conversion of energy sources on board the spacecraft into energy that fragments the spacecraft. Energy sources include chemical, pressure, and kinetic energy. *This demonstration should address whether stored energy will be removed at the spacecraft’s end of life, by depleting residual fuel and leaving all fuel line valves open, venting any pressurized system, leaving all batteries in a permanent discharge state, and removing any remaining source of stored energy, or through other equivalent procedures specifically disclosed in the application. . . .*²

Please confirm that ViaSat’s statement that “all on-board sources of stored energy will be depleted or secured” is an indication that it will remove the spacecrafts’ stored energy by depleting residual fuel and leaving all fuel line valves open, venting any pressurized system, leaving all batteries in a permanent

¹ File No. SAT-LOA-20070209-00028, Appendix A, Technical Annex, Sec. 15.2, p. 19 and File No. SAT-LOA-20070314-00051, Appendix A, Technical Annex, Sec. 15.2, p. 19.

² 47 C.F.R. § 25.114(d)(14)(ii) (emphasis added).

discharge state, and removing any remaining source of stored energy. Alternatively, if Viasat is relying on what it believes to be "other equivalent procedures," please submit a detailed description of the procedures that will be relied on, as well as an analysis of the equivalency of these measures to those identified in the rule. We also note that Section 25.283(c) of the Commission's rules sets forth a requirement to vent fuel, relieve pressure vessels, and discharge batteries at the spacecraft's end of life.³

Please provide the requested confirmation regarding ViaSat's orbital debris mitigation statements to the Secretary before May 15, 2007 with a courtesy copy to both Kal Krautkramer and Arthur Lechtman of my staff. Please contact either Mr. Krautkramer or Mr. Lechtman at (202) 418-0719 if you have any questions.

Sincerely,



Robert G. Nelson
Chief, Satellite Division

cc: Keven Lippert
ViaSat, Inc.
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³ Specifically, this section provides that "[u]pon completion of any relocation authorized by paragraph (b) of this section, or any relocation at end-of-life specified in an authorization, or upon a spacecraft otherwise completing its authorized mission, a space station licensee shall ensure, unless prevented by technical failures beyond its control, that all stored energy sources on board the satellite are discharged, by venting excess propellant, discharging batteries, relieving pressure vessels, and other appropriate measures." 47 C.F.R. § 25.283(c).