

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	
O3b Limited	)	IBFS File No. SAT-AMD-20170301-00026
	)	Call Sign S2935
	)	
Space Exploration Holdings, LLC	)	IBFS File No. SAT-LOA-20170301-00027
	)	Call Sign S2992
	)	
Telesat Canada	)	IBFS File No. SAT-PDR-20170301-00023
	)	Call Sign S2991
	)	

**CONSOLIDATED REPLY OF VIASAT, INC.**

ViaSat, Inc. hereby replies to the responses filed by O3b Limited (“O3b”), Space Exploration Holdings, LLC (“SpaceX”), and Telesat Canada (“Telesat”) in connection with the above-captioned applications, which were filed in the pending non-geostationary-satellite orbit (“NGSO”) processing round covering frequencies in the V-band (the “Applications”).<sup>1</sup>

ViaSat’s comments on the Applications urged the Commission to facilitate shared and efficient use of V-band spectrum by NGSO systems and geostationary satellite orbit (“GSO”) networks by conditioning each NGSO Application grant to ensure that future deployment of GSO systems is not precluded or impeded, and that multiple NGSO systems can coexist through

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<sup>1</sup> See *Satellite Policy Branch Information, Boeing Application Accepted for Filing in Part, IBFS File No. SAT-LOA-20160622-00058, Cut-Off Established for Additional NGSO-Like Satellite Applications or Petitions for Operations in the 37.5-40.0 GHz, 40.0-42.0 GHz, 47.2-50.2 GHz, and 50.4-51.4 GHz Bands*, Public Notice, DA 16-1244 (rel. Nov. 1, 2016) (“Public Notice”).

any sharing mechanisms that may be adopted in the future for V-band NGSO systems.<sup>2</sup> Specifically, ViaSat proposed that grant of any Application for an NGSO system in the processing round be conditioned upon compliance with Article 22.2 of the ITU’s Radio Regulations—which requires NGSO systems to protect GSO networks from unacceptable interference—and that this condition apply pending the Commission’s adoption of any other NGSO-GSO sharing criteria for the V-band. In addition, ViaSat urged that any such grants be subject to the outcome of any future proceeding regarding V-band NGSO operations, including any proceeding to address EPFD limits in the V band.

Since ViaSat filed those comments, the Commission adopted default sharing rules for NGSO and GSO systems that allow both types of systems to be licensed in bands where the Commission has not yet adopted specific service rules.<sup>3</sup> Those default rules are based on the Article 22.2 obligations of NGSO systems not to cause unacceptable interference to GSO networks.

In their respective responses, SpaceX, O3b and Telesat do not object to ViaSat’s comments or proposed conditions. Specifically, SpaceX indicated that it does not object to conditions designed to protect GSO networks, and expressed support for the international efforts underway to develop EPFD limits for NGSO operations in V-band frequencies.<sup>4</sup> Moreover, O3b

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<sup>2</sup> See Consolidated Comments of ViaSat, Inc., File Nos. SAT-AMD-20170301-00026, SAT-LOA-20170301-00027, SAT-PDR-20170301-00023 (September 25, 2017) (“ViaSat Consolidated Comments”).

<sup>3</sup> See *Update to Parts 2 and 25 Concerning Non-Geostationary, Fixed-Satellite Service Systems and Related Matters*, IB Docket No. 16-408, Report and Order and Further Notice of Proposed Rulemaking, FCC 17-122, at ¶ 39 & Appendix A, Section 25.289 (rel. Sept. 27, 2017) (“*NGSO Order*”).

<sup>4</sup> See Consolidated Response to Comments of Space Exploration Holdings, LLC, File No. SAT-LOA-20170301-00027, at 5 (filed Oct. 10, 2017).

agreed with ViaSat regarding the need for NGSO networks to protect GSO operations, including through conditions that would subject authorized V-band NGSO operations to any rules adopted in the future. O3b also urged that the Commission develop “effective regulatory measures and enforcement mechanisms to protect GSO satellites from the potential for aggregate interference from multiple NGSO systems.”<sup>5</sup> Similarly, Telesat indicated that it has no objection to conditions requiring NGSO systems to comply with EPFD limits or other technical limits that may be adopted in the future to protect co-frequency V-band GSO operations, and urged that each grant of authority in the V-band processing round be subject to such conditions.<sup>6</sup>

For these reasons and those set forth in its initial comments, ViaSat urges the Commission to impose conditions on any grant of the Applications to ensure compliance with requirements to protect GSO operations from unacceptable interference, and subject to the outcome of any future proceeding addressing V-band NGSO operations.

Respectfully submitted,

/s/

Christopher J. Murphy  
Associate General Counsel, Regulatory Affairs  
Daryl H. Hunter  
Senior Director, Regulatory Affairs  
VIASAT, INC.  
6155 El Camino Real  
Carlsbad, CA 92009

John P. Janka  
Elizabeth R. Park  
Jarrett S. Taubman  
LATHAM & WATKINS LLP  
555 Eleventh Street, N.W.  
Suite 1000  
Washington, DC 20004

*Counsel for ViaSat, Inc.*

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<sup>5</sup> Response of O3b Limited, File No. SAT-AMD-20170301-00026, at 3-4 (filed Oct. 11, 2017).

<sup>6</sup> See Consolidated Response of Telesat Canada, File No. SAT-PDR-20170301-00023, at 3-4.

**CERTIFICATE OF SERVICE**

I, Kayla Ernst, hereby certify that on this 23rd day of October, 2017, I served a true copy of the foregoing Consolidated Reply of ViaSat, Inc. via first-class mail upon the following:

Suzanne Malloy  
O3b Limited  
900 17<sup>th</sup> Street, NW  
Suite 300  
Washington, DC 20006

Karis Hastings  
SatCom Law LLC  
1317 F Street, NW  
Suite 400  
Washington, DC 20004

*Counsel to O3b Limited*

Tim Hughes  
Patricia Cooper  
Space Exploration Technologies Corp.  
1030 15<sup>th</sup> Street, N.W.  
Suite 220E  
Washington, DC 20005

William M. Wiltshire  
Paul Caritj  
Harris, Wiltshire & Grannis LLP  
1919 M. Street, NW  
Suite 800  
Washington, DC 20036

*Counsel to SpaceX*

Elisabeth Neasmith  
Telesat Canada  
1601 Telesat Court  
Ottawa, Ontario  
Canada, K1B 5P4

Joseph A. Godles  
Goldberg, Godles, Wiener & Wright, LLP  
1025 Connecticut Avenue, NW  
Washington, DC 20036

*Counsel to Telesat Canada*

\_\_\_\_\_/s/\_\_\_\_\_  
Kayla Ernst