



Federal Communications Commission  
Washington, DC 20554

International Bureau

October 10, 2008

John P. Janka  
Latham & Watkins, LLP  
555 Eleventh Street, N.W.  
Suite 1000  
Washington, D.C. 20004

Re: ViaSat, Inc.  
File No. SAT-LOI-20080107-00006

Dear Mr. Janka:

This letter requests information concerning the above referenced application filed by ViaSat, Inc. (ViaSat). ViaSat seeks access to the United States market using a satellite at the 115.1° W.L. orbital location.

Under Section 25.137(c) of the Commission's rules, a non-U.S. licensed GSO-like satellite system seeking to serve the United States can have its request placed in the Commission's processing queue and considered in the order filed, if (1) the system is in orbit and operating; (2) has a license from another administration; or (3) has been submitted for coordination to the International Telecommunications Union (ITU).<sup>1</sup>

In its application, ViaSat states that the United Kingdom, Office of Communications, has made ITU filings on behalf of the Isle of Man for the IOMSAT-11 and IOMSAT-11A networks, and that the Isle of Man has authorized ManSat Limited (ManSat) to implement those networks. ViaSat also states that the networks have been internationally coordinated and that ManSat has confirmed that it will allow ViaSat to operate under ManSat's authority.

We have received a letter from the Isle of Man indicating that it has an arrangement with ManSat that provides ManSat the right to implement satellite networks, or to allow a third party to do so, using the IOMSAT-11 and IOMSAT-11A filings made by the United Kingdom on behalf of the Isle of Man government. This letter further indicates that "ViaSat or one of its affiliates" may implement a satellite system using these filings pursuant to terms agreed to between ManSat and ViaSat.<sup>2</sup> We have also received a letter from the United Kingdom confirming its filings to the ITU on behalf of ManSat for the use of frequencies at 115° W.L. and acknowledging the relationship between ManSat and ViaSat for the use of these frequencies.<sup>3</sup> To assist the Commission in processing ViaSat's application, please provide a copy of documentation detailing the relationship between ViaSat and ManSat, such as a contract or

---

<sup>1</sup> 47 C.F.R. § 25.137(c).

<sup>2</sup> Letter to International Bureau, FCC, from G. M. Quayle, Chairman, Isle of Man Communications Commission (February 22, 2008).

<sup>3</sup> Letter to Kathryn Medley, International Bureau, from Stephen Limb, Manager, International Frequency Co-ordination, Office of Communications (September 26, 2008).

written understanding between the parties. Please also provide a detailed description of ManSat, including information concerning its officers, directors, and direct and indirect shareholders. Finally, please provide information concerning ViaSat affiliates which will or may be involved in the implementation of the satellite network, including details concerning the affiliate's officers, directors, and direct and indirect shareholders, and any arrangements concerning network implementation.

ViaSat's response must be filed with the Office of the Secretary by November 10, 2008, with a courtesy copy to Alyssa Roberts of my staff. If the information is not provided within this time period the application may be dismissed pursuant to Sections 25.112(c) and 25.152(b) of the Commission's rules.<sup>4</sup> Please contact Alyssa Roberts at (202) 418-7276 if you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read 'R. Nelson', with a long horizontal line extending to the right.

Robert G. Nelson  
Chief, Satellite Division  
International Bureau

---

<sup>4</sup> 47 C.F.R. §§ 25.112(c) and 25.152(b). *Also see Amendment of the Commission's Space Station Licensing Rules and Policies*, First Report and Order and Further Notice of Proposed Rulemaking, FCC 03-102, 18 FCC Rcd 10760 (2003), at ¶244.