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# LATHAM & WATKINS LLP

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November 22, 2013

## VIA ELECTRONIC FILING

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Re: Supplemental Submission; Letter of Intent Application of ViaSat, Inc.,  
IBFS File No. SAT-LOI-20130315-00031, Call Sign S2894

Dear Ms. Dortch:

ViaSat, Inc. (“ViaSat”) is writing to provide additional information regarding the legal authority under which the launch and physical operation of the ViaSat-3 satellite will occur. As explained in ViaSat’s June 6, 2013 response to the Commission’s request on that issue, sufficient contacts with the United Kingdom will exist to provide the UK Space Agency with jurisdiction over such matters.

ViaSat intends that its wholly-owned United Kingdom subsidiary, ViaSat UK, a company formed under the laws of England and Wales and based in Wareham, Dorset, England, will procure the launch, and also will have control over the tracking, telemetry, and command (“TT&C”) functions, of the ViaSat-3 satellite. Thus, the U.K. Outer Space Act of 1986 will apply to ViaSat UK’s “launching or procuring the launch of a space object” and “operating a space object.”<sup>1</sup> The Act applies to these activities “whether carried on in the United Kingdom or elsewhere” by U.K. nationals, such as ViaSat UK.<sup>2</sup>

Furthermore, ViaSat UK is an integral part of ViaSat’s global enterprise and is directly involved in the delivery and marketing of ViaSat’s satellite services in the U.K. and through Europe. Among other things, ViaSat UK markets and delivers to the U.K. government and business interests a variety of satellite communications solutions, including mobile, transportable

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<sup>1</sup> See Outer Space Act, 1986 c. 38, § 1(a), (b) (U.K.).

<sup>2</sup> *Id.* at §§ 1, 2.

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and fixed broadband solutions at Ka band. Moreover, ViaSat UK's management has a significant overlap with that of ViaSat, Inc.

If you have any questions regarding this submission, please feel free to contact the undersigned.

Respectfully submitted,

/s/

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Elizabeth R. Park

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