



Federal Communications Commission  
Washington, D.C. 20554

May 9, 2013

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

Re: ViaSat, Inc.  
IBFS File No. SAT-LOI-20130315-00031  
(Call Sign S2894)

Dear Mr. Janka:

This letter requests additional information regarding the above referenced Letter of Intent filed by ViaSat, Inc. In its application, ViaSat seeks U.S. market access using a planned geostationary orbit satellite, ViaSat-3, which it proposes to operate at the 79.3° W.L. orbital location under the authority of the United Kingdom. ViaSat states that the United Kingdom authorization for this space station “is held by ViaSat Satellite Holdings Ltd., a direct, wholly owned subsidiary of ViaSat.”<sup>1</sup>

Section 25.137(c) of the Commission’s rules requires operators of non-U.S.-licensed geostationary orbit-like satellite systems seeking market access to demonstrate that the satellite is in-orbit and operating, or that the system has a license from another administration, or that the system has been submitted for coordination to the International Telecommunication Union (ITU).

ViaSat’s application fails to include specific information with respect to the authorization held by its subsidiary, nor does it indicate whether the United Kingdom has submitted filings on its behalf to the ITU. Accordingly, ViaSat must address in greater detail the status of its U.K. authorization for the ViaSat-3 space station. In particular, please state whether ViaSat has obtained launch and space operations licenses for ViaSat-3 under the U.K. Outer Space Act. If not, ViaSat should provide a statement detailing the status of the application process for the license and an assessment of whether, by virtue of its wholly owned subsidiary and any other factors considered relevant under the U.K. Outer Space Act, it has sufficient ties to the United Kingdom to provide the basis for issuing such authorizations. In providing this assessment, ViaSat should identify the specific provisions of the U.K. Outer Space Act and the Space Agency’s implementing guidance on which it is relying. ViaSat should also indicate whether filings have been submitted to the ITU on its behalf for the space station and provide documentation from an appropriate U.K. official regarding any such filings.

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<sup>1</sup> ViaSat, Inc., IBFS File No. SAT-LOI-20130315-00031, at 8.

Please file the requested information within 30 days of the date of this letter, with a courtesy copy to Alyssa Roberts of my staff. Failure to respond by this date may result in dismissal of the Letter of Intent pursuant to Sections 25.112(c) and 25.152(b) of the Commission's rules.<sup>2</sup>

Sincerely,



Fern J. Jarmulnek  
Acting Chief, Satellite Division  
International Bureau

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<sup>2</sup> 47 C.F.R. §§ 25.112(c) and 25.152 (b).