



Federal Communications Commission
Washington, DC 20554

International Bureau

November 18, 2008

John P. Janka
Counsel for ViaSat, Inc.
555 Eleventh Street, NW
Suite 1000
Washington, D.C. 20004

Re: ViaSat, Inc.
File No. SAT-MOD-20080718-00144 (Call Sign S2737)

Dear Mr. Janka:

This letter requests additional information concerning the above-referenced modification application filed by ViaSat, Inc. (ViaSat). In the application, ViaSat seeks to make various technical changes to its licensed geostationary satellite orbit (GSO) space station. ViaSat requests a waiver of Section 25.114(d)(3) of the Commission's rules, which requires ViaSat's application to include "predicted space station antenna gain contours for each transmit and receive beam requested."¹ ViaSat states that its modified satellite will utilize a bent-pipe architecture consisting of 20 transmit/receive "A-Type Spot Beams" and 72 transmit/receive "B-Type Spot Beams." ViaSat includes four representative A-Type Spot Beams (transmit and receive in both polarizations) and four representative B-Type Spot Beams (transmit and receive in both polarizations) in Schedule S of its application, maintaining that it would be burdensome to include all 184 beams with its application. ViaSat also states that it will provide additional gain contour files for other spot beams upon Commission request.²

We find that the eight representative beams do not provide sufficient information to allow us to determine whether ViaSat's modified space station will operate in conformance with the Commission's rules and will not cause interference to other systems. In light of ViaSat's claim that including the contour information for each beam is burdensome, ViaSat may, in lieu of providing the information as set forth in the rules, either:

1. Provide a text file with a table listing all 92 transmit/receive beams (labeled by city and state), the boresight latitude, the boresight longitude, the EIRP at boresight, and the associated antenna beamwidth (major and minor axis for each beam, as well as the orientation of the major axis, as required to generate the beams in GIMS). Within the same text file, ViaSat must include a second table containing the half cone angle (in degrees) for each contour level (-2, -4, -6, -8, -10, -15, and -20 dB) for the representative co-polarized contours of the spot beams; or

¹ 47 C.F.R. § 25.114(d)(3).

² ViaSat, Inc., File No. SAT-MOD-20080718-00144 (*ViaSat Mod*), Supplemental Technical Appendix, at 15.

2. Provide a text file with a table listing all 92 transmit/receive beams (labeled by city and state), the boresight latitude and the boresight longitude, along with the predicted space station antenna gain contours for each transmit and receive beam (a total of 184 beams) in .pdf format showing the contour levels (-2, -4, -6, -8, -10, -15, and -20 dB) of the spot beams.

We also note that Section 25.114(c)(4)(iii) requires ViaSat to identify which antenna beams are connected or switchable to each transponder and to the telemetry, tracking and command operations.³ In its modification application, ViaSat requests a partial waiver of this rule and provides only a representative example of the types of interconnections that can exist between an individual A-Type Spot Beam and any individual B-Type Spot Beam, and vice versa.⁴ ViaSat contends that it would be burdensome to provide all 144 interconnections; more specifically, that the rule requires it to list all 184 spot beams in Sections S7 and S8 of Schedules S.⁵ To assist us in reviewing the waiver request, please explain how compliance with the rule is burdensome. Please also explain how the public interest will be served by a waiver given the unique “A and B-Type Spot Beam” system architecture proposed.

Accordingly, ViaSat must amend its Schedule S form to include the requested information. ViaSat must file its response in the form of amendment to the underlying modification application within 15 days of the date of this letter, with a courtesy copy to Kal Krautkramer of my staff. Failure to respond by this date may result in dismissal of the application pursuant to Sections 25.112(c) and 25.152(b) of the Commission’s rules.⁶ Please contact Kal Krautkramer at (202) 418-1335 if you have any questions.

Sincerely,



Robert G. Nelson
Chief, Satellite Division
International Bureau

cc: Mr. Daryl T. Hunter

³ 47 C.F.R. § 25.114(c)(4)(iii).

⁴ *ViaSat Mod*, Supplemental Technical Annex, at 15-16, and Schedule S, Section S10.

⁵ *ViaSat Mod*, Supplemental Technical Annex, at 15.

⁶ 47 C.F.R. §§ 25.112(c) and 25.152 (b).