

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

In the Matter of)	
)	
O3b Limited)	IBFS File No. SAT-
)	MOD-20160624-00060
Modification to U.S. Market Access Grant)	
for the O3b MEO Satellite System)	

COMMENTS OF VIASAT, INC.

ViaSat, Inc. (“ViaSat”) submits these comments to the above-referenced modification application filed by O3b Limited (“O3b”), which seeks U.S. market access for additional components of a non-geostationary-orbit (“NGSO”) satellite constellation that would use Ka-band frequencies (“Application”). The Commission is treating the Application as part of the NGSO-like satellite processing round for which other applications are not due until November 15, 2016.¹

ViaSat submits these comments in order to request that O3b’s Application not be treated in isolation, but with the other applications that are or will be a part of the processing round after the November 15, 2016 filing deadline. ViaSat therefore requests that the Commission defer consideration of this Application and any requests therein until interested parties have the opportunity to evaluate in full the operating environment that would result from all of the NGSO systems proposed by the November 15, 2016 close of the processing round.

¹ See *Satellite Policy Branch Information; OneWeb Petition Accepted for Filing; IBFS File No. SAT-LOI-20160428-00041; Cut-Off Established for Additional NGSO-Like Satellite Applications or Petitions for Operations in the 10.7-12.7 GHz, 14.0-14.5 GHz, 17.8-18.6 GHz, 18.8-19.3 GHz, 27.5-28.35 GHz, 28.35-29.1 GHz, and 29.5-30.0 GHz Bands*, Public Notice, DA 16-804 (July 15, 2016).

A full and complete analysis of the public interest considerations relevant to O3b's Application requires concurrent consideration of each other NGSO application that may be filed in this processing round, particularly given the complexity of the shared spectrum environment inherent in the operations of multiple NGSO systems in the same spectrum as GSO networks. Namely, information about all of the NGSO systems filed in the round are needed to determine the aggregate equivalent power flux-density produced by multiple NGSO FSS systems in frequency bands where equivalent power flux-density limits exist to protect the GSO.

ViaSat therefore urges the Commission to defer further consideration of the O3b Application (and its underlying requests) and afford interested parties the opportunity to provide comment after the close of the processing round. To the extent necessary, ViaSat respectfully requests that the Commission waive the comment filing deadlines established by the September 9, 2016 public notice of the Application and Section 25.154 of the Commission's rules to allow such further comments to be considered.²

Respectfully submitted,

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/s/

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October 11, 2016

² See 47 C.F.R. § 25.154; Public Notice, *Policy Branch Information, Satellite Space Applications Accepted for Filing*, Rep. No. SAT-01184 (Sept. 9, 2016).

CERTIFICATE OF SERVICE

I, Kayla Ernst, hereby certify that on this 11th day of October, 2016, I served a true copy of the foregoing Comments of ViaSat, Inc. via first-class mail upon the following:

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