



April 20, 2020

**VIA ELECTRONIC FILING**

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

Re: Viasat, Inc. Notice of Appearance  
Application to Operate 4,408 Spacecraft in Overlapping Orbits  
Space Exploration Holdings, LLC, IBFS File No. SAT-MOD-20200417-00037

Dear Ms. Dortch:

Viasat, Inc. notifies the Commission of its intention to participate in this proceeding, in which SpaceX seeks authority to operate 4,408 spacecraft in overlapping orbits.

This written submission is made pursuant to Section 1.1202(d)(1) of the Commission's rules, 47 C.F.R. § 1.1202(d)(1). Accordingly, this proceeding is now restricted.

This proceeding raises important public interest considerations about how the Commission will evaluate applications for large LEO constellations going forward. Among other things, it raises considerations about the relationship among (i) the NASA 0.001 "passive collision risk" standard for a single satellite, (ii) the aggregate collision risk presented by large numbers of spacecraft in similar orbits, and (iii) the expected reliability of the maneuverability capabilities of a large constellation while in operational orbit.

Viasat therefore does not object to the Commission's designating the ex parte status of this proceeding as "permit-but-disclose" under the Commission's rules, 47 C.F.R. § 1.1206.

Please contact me if you have any questions.

Respectfully submitted,

/s/

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\* Service via electronic mail due to COVID-19.