

Request for Extension or Waiver of Milestone Date

Viasat, Inc. (“Viasat”) is authorized to serve the United States using ViaSat-3, a Ka-band GSO FSS satellite at 88.9° W.L.¹ ViaSat-3 is currently subject to a launch and operation milestone of May 31, 2023.² That milestone deadline reflects the assumption that the satellite would be launched on or about April 18, 2023.³ However, due to factors outside of Viasat’s control (including inclement weather), the satellite could not be launched until April 30, 2023—12 days later than anticipated. As a result, Viasat was unable to complete the orbit-raising process and position the satellite at the 88.9° W.L. orbital location prior to mid-May.

The launch delay also adversely affected the timetable for the on-station deployment of ViaSat-3. Notably, the on-station deployment process must be completed in a careful and deliberate manner. Among other things, this process involves evaluation of telemetry and other data and consequent adjustments to the deployment plan. The overall process may also involve additional steps based on case-specific factors, which may impact the overall deployment timetable.

Viasat has made significant progress in the on-station deployment of the ViaSat-3 satellite but has not yet completed that process. Pending such completion, Viasat has not commenced operations throughout the Ka band. Viasat anticipates that it will be able to do so shortly. Accordingly, and out of an abundance of caution, Viasat is requesting a one-month extension of its milestone deadline, until June 30, 2023. Under Section 25.117(e) of the Commission’s rules, such an extension may be granted when “additional time is required due to unforeseeable circumstances beyond the applicant’s control,” or where “unique and overriding public interest concerns” justify an extension.⁴ Viasat’s extension request easily satisfies this standard, as: (i) Viasat could not have anticipated or avoided the 12-day delay of ViaSat-3’s launch; (ii) the satellite has been constructed, launched, and positioned at the 88.9° W.L. orbital location; and (iii) there is a clear public interest in ensuring that Viasat is able to take the *de minimis* amount of additional time necessary to ensure that its network is deployed in a responsible manner that supports the provision of high-quality service to the public.

¹ The ViaSat-3-class satellite at 88.9° W.L. also includes VIASAT-89US, a separately authorized payload with a launch and operation milestone of May 27, 2025. See ICFS File No. SAT-LOA-20190617-00048, Call Sign S3050 (granted May 27, 2020).

² See ICFS File No. SAT-MOD-20230324-00063, Stamp Grant (granted Apr. 27, 2023).

³ See *id.*, Narrative.

⁴ 47 C.F.R. § 25.117(e).

CERTIFICATION

I, David Abrahamian, hereby make the following certifications to the Federal Communications Commission.

1. I am Vice President, Satellite Systems of Viasat, Inc.
2. The factual information contained in the foregoing Request for Extension or Waiver of Milestone Date is true and correct to the best of my knowledge, information and belief.

_____/s/
David Abrahamian

Executed May 31, 2023