



July 1, 2020

**BY ELECTRONIC FILING**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, DC 20554

Re: *Viasat, Inc., IBFS File No. SAT-MPL-20200526-00056*

Dear Ms. Dortch:

This letter is in response to a June 24, 2020 filing from Viasat, Inc. (“Viasat”) ostensibly about the above referenced application for modification of Viasat’s existing authorization to provide service in the U.S. from a non-geostationary orbit (“NGSO”) fixed-satellite service (“FSS”) system.

Viasat is requesting the Commission authorize greater than a fourteen-fold increase in the number of satellites it can use to provide service in the United States from its non-U.S. NGSO satellite system. Surprisingly, Viasat requests that the Commission handle this application outside of the recently initiated second processing round for Ku/Ka-band NGSO FSS systems.<sup>1</sup> Yet, despite this extraordinary request, Viasat failed to provide the basic information necessary to adequately demonstrate that its proposed operations will not cause a significant increase in interference or spectrum sharing issues for other licensed NGSO FSS systems. Without this demonstration, its application can only be considered as part of the second processing round.

Space Exploration Holdings, LLC (“SpaceX”) filed a letter pointing out some of the necessary information that is lacking in the record.<sup>2</sup> Rather than provide that information to support its application, Viasat responded with an assortment of unrelated commentaries about SpaceX. The only information Viasat did provide was to identify the specific ITU network filing on which it relied—which it filed only after it filed its application with the Commission.

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<sup>1</sup> See Public Notice, “Cut-Off Established for Additional NGSO FSS Applications or Petitions for Operations in the 10.7-12.7 GHz, 12.75-13.25 GHz, 13.8-14.5 GHz, 17.7-18.6 GHz, 18.8-20.2 GHz, and 27.5-30.0 GHz Bands,” 35 FCC Rcd. 2881 (IB 2020).

<sup>2</sup> See Letter from William M. Wiltshire to Marlene H. Dortch, IBFS File No. SAT-MPL-20200526-00056 (June 18, 2020).

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The Commission should look past Viasat's transparent and cynical attempt to distract from the shortcomings in its own application. SpaceX asks only that the Commission request from Viasat the additional information SpaceX has previously identified as necessary to make the threshold determination of how to process Viasat's pending application.

Very best regards,

*/s/ David Goldman*

David Goldman  
Director of Satellite Policy

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The SpaceX logo is located at the bottom right of the page. It features the word "SPACEX" in a bold, blue, sans-serif font. To the right of the text is a stylized, grey, curved line that represents a rocket's trajectory or a wing, extending from the end of the word and curving upwards and to the right.