



July 2, 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;  
*Space Exploration Holdings, LLC*, IBFS File No. SAT-MOD-20200417-00037

Dear Ms. Dortch:

Viasat files this letter in response to the SpaceX *ex parte* letter of July 1, 2020.<sup>1</sup> In our letter of June 24, 2020 in these proceedings,<sup>2</sup> we explained that Viasat has provided the same type of information SpaceX has provided in support of its own multiple modification requests:

“[SpaceX] [d]id not provide the corresponding information in its own recent modification application that it now claims is a threshold requirement for the Commission to process Viasat’s modification application.”<sup>3</sup>

Nothing in SpaceX’s July 1 response disputes this fact.

Nor does SpaceX dispute that Viasat has used the *very same methodology that SpaceX has used* in assessing the impact of its serial modifications on the interference environment. This is the case even when SpaceX has proposed changes like decreasing the elevation angles at which it will operate, which potentially could lead to increased interference into both satellite and terrestrial services.

It goes without saying that the Commission should treat applicants similarly and elicit the same types of information in similar cases.

Respectfully submitted,

/s/

Christopher J. Murphy  
Associate General Counsel, Regulatory Affairs

cc: Jose P. Albuquerque

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<sup>1</sup> See Letter from David Goldman, Director of Satellite Policy to Marlene H. Dortch, Secretary, FCC (dated July 1, 2020).

<sup>2</sup> See Letter from Christopher J. Murphy, Associate General Counsel, Regulatory Affairs, to Marlene H. Dortch, Secretary, FCC (dated June 24, 2020).

<sup>3</sup> *Id.* at 1.