

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
VIASAT, INC.)	Call Sign: E202143
Application for Blanket Earth Station License Using Ka-band Spectrum)	File No. SES-LIC-20200811-00852

REPLY OF SPACE EXPLORATION HOLDINGS, LLC

Viasat, Inc. (“Viasat”) seeks a blanket license to operate 1.8-meter and 2.4-meter Fixed Satellite Service (“FSS”) earth stations to operate with the geostationary orbit (“GSO”) ViaSat-3 satellite in several bands, including the 18.8-19.3 GHz and 28.6-29.1 GHz bands—both of which the Commission has designated for non-geostationary orbit (“NGSO”) satellite operations on a primary basis.¹ Yet, as Space Exploration Holdings, LLC (“SpaceX”) and others have demonstrated, Viasat is currently operating in these bands in clear violation of the terms of three other blanket earth station licenses, to the detriment of SpaceX’s users and the users of other NGSO systems with priority in those bands.²

In response, Viasat does nothing more than argue that the same conditions it violated on its previous licenses will be sufficient this time.³ Given Viasat’s track record of flagrant disregard for such conditions, such assurances are no longer adequate. The Commission cannot grant Viasat an opportunity to compound its violations and the harm

¹ See Exhibit A – Description of Application, IBFS File No. SES-LIC-20200811-00852 (Aug. 11, 2020).

² See Petition to Deny of Space Exploration Holdings, LLC, IBFS File No. SES-LIC-20200811-00852 (July 16, 2021).

³ See Consolidated Opposition to Petition and Response to Comments of Viasat, Inc., IBFS File No. SES-LIC-20200811-00852, at 2-3 (July 29, 2021) (“Viasat Response”).

it causes consumers by deploying gateway earth stations throughout the United States, particularly while its already operating in the NGSO Ka-Bands without authorization. Granting such authorization would exacerbate the current situation and cause additional interference to NGSO operators just as they are in the process of deploying systems that are providing true high-throughput, low-latency broadband to those for whom this service is not otherwise available.

Accordingly, the Commission must deny Viasat's application to use the NGSO Ka-Bands.

Respectfully submitted,

SPACE EXPLORATION HOLDINGS, LLC

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August 10, 2021

CERTIFICATE OF SERVICE

I hereby certify that, on this 10th day of August, 2021, a copy of the foregoing Reply was served via First Class mail upon:

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