

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Viasat, Inc. Application to Modify Authority to)	File No. SES-MOD-20190212-00172
Operate Ka-band Aeronautical Antennas)	Call Sign E180006

REPLY OF O3B LIMITED

O3b Limited (“O3b”) submits this reply regarding the above-captioned Viasat, Inc. (“Viasat”) application to modify its Ka-band aeronautical terminal license by adding frequencies, including a request for nonconforming use of the 28.6-29.1 GHz and 18.8-19.3 GHz bands in which non-geostationary orbit (“NGSO”) systems such as O3b’s have sole primary status.¹

In its initial comments, O3b emphasized that any grant of the Application must be conditioned to ensure that O3b’s operations in the NGSO-primary frequencies are not harmed.² O3b observed that the appropriate mechanism for addressing the risk of interference to O3b shown by Viasat’s own analysis was coordination between Viasat and O3b.³ Pending the satisfactory completion of that coordination, O3b asked that Viasat be required to use its Network Management System to inhibit emissions in the NGSO-primary frequencies to protect O3b’s operations.⁴ Viasat’s response purports to accept the condition language requested by O3b, but Viasat alleges that the condition would allow it to use the NGSO-primary spectrum “in

¹ Viasat, Inc., Call Sign E180006, File No. SES-MOD-20190212-00172 (“Application”).

² Comments of O3b Limited, Call Sign E180006, File No. SES-MOD-20190212-00172, filed Oct. 25, 2019 (“O3b Comments”).

³ *Id.* at 4.

⁴ *Id.* at 4-5.

virtually all circumstances, and without coordination, by simply maintaining a separation angle of 7.6 degrees from O3b's system.”⁵

O3b strongly disagrees that a separation of 7.6 degrees would guarantee adequate protection of the O3b system and objects to Viasat's attempts to define the terms for determining whether interference from its proposed non-conforming service into O3b's primary operations would be deemed acceptable. The 7.6 degree separation value Viasat refers to comes from the original analysis provided with the Application,⁶ but as O3b has explained, the Application's calculations were impermissibly based on a criterion for interference between co-primary systems and are flawed in other respects as well.⁷ Moreover, the calculations showed that even the unjustifiably generous interference threshold used by Viasat would be exceeded with respect to the O3b system.⁸

The Commission cannot permit Viasat to unilaterally specify the scope of its obligations to protect O3b's network. Instead, any required separation angle to prevent interference to O3b must be determined as part of coordination discussions between the parties. Until coordination is

⁵ See Response of Viasat, Inc., Call Sign E180006, File No. SES-MOD-20190212-00172, filed Nov. 7, 2019 (“Viasat Response”) at 1-2.

⁶ *Id.* at 2 n.3, *citing* Application, Attachment 1 at 6.

⁷ O3b Comments at 3-4.

⁸ *Id.* at 4.

completed, Viasat must be unequivocally required to protect the O3b operations in the NGSO-
primary spectrum at all times.

Respectfully submitted,

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November 20, 2019

CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of November, 2019, I caused to be served a true copy of the foregoing "Reply of O3b Limited" by first class mail, postage prepaid, upon the following:

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