

Narrative

On December 11, 2017, Viasat submitted a petition for reconsideration with respect to condition 90447 of its earth station license for call sign E170088, granted November 9, 2017. In support of that petition, Viasat included a detailed technical demonstration of how it would protect the NGSO FSS satellite systems referenced in that condition with respect to the 28.6-29.1 GHz and 18.8-19.3 GHz band segments and thereby comply with the terms of that condition. Viasat submitted that petition in an effort to obviate the need for future license modifications related to that condition. Viasat provided further technical analysis in response to comments made by the only party that responded to the petition.

That petition is still outstanding. Out of an abundance of caution, Viasat is filing this license modification application with respect to condition 90447, along with a copy of the technical analyses described above, which, as noted, currently are before the Commission with respect to call sign E170088. Those analyses are included here as Exhibits A and B. As Viasat explained in its petition, those analyses (i) discuss the results of a series of simulations, and (ii) demonstrate the absence of predicted harmful interference from the earth station operations authorized by call sign E170088 into NGSO systems operating in the 28.6-29.1 GHz and 18.8-19.3 GHz band segments. As Exhibit A explains, even without maintaining any angular separation, harmful uplink interference would not reasonably be expected to occur.

Moreover, if the level of unwanted emissions resulting from the absence of angular separation is deemed to be “harmful,” the separation angles for each NGSO system identified in Table 1 of Exhibit A readily could be used as the trigger point for ceasing (and resuming) transmissions with respect to any such NGSO system when that system is operating in the 28.6-29.1 GHz and 18.8-19.3 GHz band segments at separation angles greater than the separation angle identified in Table 1. And as Viasat further explained at the time, any cessation of uplink operations in the 28.6-29.1 GHz band segment correspondingly would result in a cessation of downlink transmissions in the 18.8-19.3 GHz band segment.

Viasat also includes as Exhibit C a confidential submission it made on May 18, 2020 with respect to call sign E170088 and condition 90447. In that May 2020 submission, Viasat presented the terms of a draft international coordination agreement with an NGSO system, under which Viasat remains willing to operate, as a means by which the Commission also could deem condition 90447 satisfied with respect to that system. That agreement includes **{{BEGIN CONFIDENTIAL}}**

{{END CONFIDENTIAL}} to which Viasat is willing to agree as part of the overall terms of the agreement. Notably, the NGSO system’s operations will be protected by that provision; namely **{{BEGIN CONFIDENTIAL}}**

{{END CONFIDENTIAL}}.