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November 5, 2012

VIA ELECTRONIC FILING

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

Re: Submission of *Ex Parte* Presentation; IBFS File Nos. SES-LIC-20120427-00404; SES-STA-20120815-00751, Call Sign E120075

Dear Ms. Dortch:

ViaSat, Inc. ("ViaSat") files this *ex parte* submission to supplement the record in these proceedings. As explained in ViaSat's Supplemental Submission in this proceeding on July 20, 2012, ViaSat believes that the operation of the aeronautical terminals in the Ka band should be treated as an application of the FSS across the entire portion of the Ka band that has been authorized for use by GSO FSS spacecraft.[1] In this respect, it is important to recognize that the existing primary allocations for the MSS in the Ka band are quite limited, and cover only 100 MHz in Regions 1 and 3 (29.9-30.0 GHz and 20.1-20.2 GHz), and only 500 MHz in Region 2 (29.5-30.0 GHz and 19.7-20.2 GHz).

In contrast, high-capacity spacecraft such as ViaSat-1 rely on access to a full 1500 MHz of spectrum in order to serve its coverage area. In particular, ViaSat-1 achieves its unprecedented capacity throughout its coverage area by employing many small spot beams and a frequency reuse plan that requires geographic separation among co-channel spot beams. As a result, the band segments allocated for MSS are not used in adjacent spot beams. This means that the connection for an aircraft that is flying across the United States will have to be handed off from one spot beam to another, and in the case on many flights, will require use of a portion of the Ka band that is allocated only for FSS.

Stated another way, operation in the 28.35-29.1 GHz and 18.3-19.3 GHz band segments on ViaSat-1, which are allocated only for FSS, is essential to avoid gaps in coverage. This

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1 ViaSat, Inc. Supplemental Submission, File No. SES-LIC-20120427-00404, Call Sign E120075 (filed July 20, 2012) ("Supplemental Submission").

concept is illustrated in the attached map, which shows the spot beams[2] on ViaSat-1 that do not utilize the 19.7-20.2 GHz and 29.5-30.0 GHz band segments.

Please contact the undersigned if you have any questions regarding this submission.

Respectfully yours,

/s/

John P. Janka
Elizabeth R. Park

Enclosures

cc: Robert Nelson
Andrea Kelly
Stephen Duall
William Bell
Howard Griboff
Paul Blais
Joseph Hill
Byung K. Yi
David Keir, Counsel to Row 44, Inc.

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2 Coverage for -4 dB contour depicted for each beam.


Lake Nipigon
Lake Superior
North Dakota
Montana
Minnesota
Rocky Mountains
Ottawa
Green Bay
Lake Huron
Georgian Bay
Bay of Fundy
Idaho
Michigan
Lake Ontario
New York
South Dakota
Wisconsin
Lake Michigan
Wyoming
Lake Erie
Pennsylvania
Iowa
New Jersey
Nebraska
Illinois
Indiana
Ohio
Maryland
Washington
Nevada
Utah
Colorado
West Virginia
Kansas
Kentucky
Virginia
Missouri
North Carolina
Tennessee
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