

Request for Special Temporary Authority

ViaSat, Inc. (“ViaSat”) requests special temporary authority (“STA”) to operate two currently licensed 9.1 meter earth stations at modified parameters to support telemetry, tracking and control (“TT&C”) communications during the orbit raising of the ViaSat-2 satellite,¹ which is scheduled to be launched on or about June 1, 2017. ViaSat seeks STA for its earth stations located in Albuquerque, NM (call sign E160089) and Des Moines, IA (call sign E160091). Each is authorized to communicate with ViaSat-2, but additional authority is necessary to allow operations at higher EIRP levels than are authorized for regular operations, and to allow communications with ViaSat-2 while tracking the satellite through the sky as it is drifted to the 69.9° W.L. orbital location during electric orbit raising.

ViaSat-2 is expected to be launched on or about June 1, 2017, and orbit raising is expected to commence two weeks after launch. Because the satellite utilizes electric propulsion, orbit raising is expected to occur over five months. Therefore, STA is requested to commence on or about June 12, 2017 and continue for 180 days.

The following are the modified technical parameters for the earth stations for the requested STA:

Transmit Frequencies (center): 29.501 GHz and 29.999 GHz (narrowband command)
Bandwidth: 1 MHz
Polarization: RHCP
Uplink EIRP: 87 dBW
Emission Designator: 1M00F2D

Receive Frequencies: 18.301 GHz and 18.303 GHz
Bandwidth: 1 MHz
Polarization: RHCP
Downlink EIRP: 12 dBW
Emission Designator: 1M00F2D

Azimuth Range: 90-270 degrees
Elevation Range: 15-50 degrees

ViaSat-2 is authorized by the United Kingdom. All technical parameters of the satellite are as specified in the ViaSat-2 authorization or as identified here for purposes of orbit raising. However, to the extent necessary, ViaSat seeks a waiver of any informational requirements of Sections 25.114 and 25.137 in connection with the proposed STA operations to the extent such information has not been provided herein or in connection with the Commission’s grant of U.S. market access for ViaSat-2. Furthermore, Section 25.137 is designed to ensure that “U.S.-licensed satellite systems have effective competitive opportunities to provide analogous services” in other countries. This STA request does not relate to any service that will be provided by the

¹ See Call Sign 2902; IBFS File Nos. SAT-LOI-20130319-00040 (granted Dec. 12, 2013); SAT-MOD-20141105-00121 & SAT-AMD-20150105-00002 (granted Apr. 15, 2015); SAT-MOD-20160527-00053 (granted Jan. 12, 2017).

satellite, but rather seeks authority to use earth station facilities for TT&C while the satellite is in transfer orbit on the way to its final orbital location. Thus, the purpose of the information required by Section 25.137 is not implicated here.²

ViaSat will coordinate radiofrequency communications for the support of orbit raising with other spacecraft operators that may potentially be affected during these operations. In accordance with normal industry practices, communications with other operators will be kept open in the period leading to and throughout the orbit raising activities to ensure that STA operations will be conducted on a non-interference basis.

Grant of the requested STA will serve the public interest, convenience and necessity because it will enable ViaSat to conduct essential operations to support the orbit raising operations of ViaSat-2 that need to be completed to bring this new satellite into commercial operation.

² See, e.g., *EchoStar Satellite Operating Company Application for Special Temporary Authority*, File No. SAT-STA-20130220-00023, Call Sign S2232, Order and Authorization, DA 13-593, ¶ 5 n.10 (rel. Apr. 1, 2013) (noting that request for earth station STA for TT&C operations during satellite relocation does not constitute the provision of “DBS service to the United States”).