

## Narrative Request for Special Temporary Authority

Viasat, Inc. hereby requests special temporary authority (“STA”) for thirty (30) days to operate the fixed-satellite service (“FSS”) earth stations identified in Attachment 1 (collectively, the “Earth Stations”) at the fixed locations identified in that attachment to facilitate in-orbit testing (“IOT”) of the ViaSat-3F2 satellite at the 79.0° W.L. orbital location.<sup>1</sup> The Earth Stations would operate in portions of the Ka band under the technical parameters specified in Attachment 1. Grant of this request would serve the public interest by enabling Viasat to conduct in-orbit tests with the ViaSat-3F2 satellite in preparation for service to the United States market.

Viasat is authorized to serve the United States market with the ViaSat-3F2 satellite at the 79.0° W.L. orbital location.<sup>2</sup> The ViaSat-3F2 satellite was launched in November 2025, and arrived at the 79.0° W.L. orbital location in early March. Viasat seeks STA for the limited purpose of conducting in-orbit tests of the ViaSat-3F2 satellite to ensure that it is ready to serve the United States market. Viasat will not provide any commercial service under this STA. IOT of the ViaSat-3F2 network under this STA request would involve the use of two sizes of gateway-type Earth Stations identified in Attachment 1 at the fixed locations identified in that attachment.<sup>3</sup> Except as otherwise noted in Attachment 1, each of the Earth Stations is already operational and authorized to communicate with the ViaSat-3F1 satellite at the 88.9° W.L. orbital location. As such, Viasat is essentially requesting temporary authority to “repoint” each of the Earth Stations to the 79.0° W.L. orbital location for IOT purposes.<sup>4</sup>

Under the requested STA, Viasat would conduct a variety of tests intended to prepare the satellite network for commercial service, including: (i) payload hardware bring-up and calibration; (ii) verification of ground system-to-payload interfaces; (iii) configuration and validation of payload hardware and algorithms; and (iv) verification of end-to-end system configuration, performance, and stability for system validation purposes. Most tests during IOT would be conducted using modulated frequencies, except for carrier wave tests which would be conducted over approximately two days at the beginning of the IOT period. The Earth Stations would transmit and receive either carrier signals or artificially generated data to facilitate IOT

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<sup>1</sup> See 47 C.F.R. § 25.120.

<sup>2</sup> See Viasat, Inc., Call Sign S3113, ICFS File No. SAT-PPL-20211207-00172. While Viasat’s petition for market access refers to the VIASAT-79W satellite, Viasat subsequently clarified that this would be the ViaSat-3F2 satellite.

<sup>3</sup> Viasat refers to these gateway-type earth stations as satellite access nodes, or “SANs.” IOT would also involve communications with a limited number of “anchor terminals”—essentially, user terminals that would operate at fixed locations. Viasat is requesting authority to conduct IOT with those anchor terminals in a separate request being filed in parallel with the instant request. See Viasat, Inc., ICFS File No. SES-STA-20260621-01855.

<sup>4</sup> Viasat intends to add the ViaSat-3F2 satellite as an authorized point of communication for each of the Earth Stations identified in Attachment 1 through future applications.

operations. No customer data would be transmitted during testing, and no service would be provided to third parties. The Earth Stations and all IOT operations would be managed by Viasat personnel.

Except as described below, all operations with the ViaSat-3F2 satellite under the requested STA would be consistent with the Commission's regulatory framework for the Ka band and the parameters specified in Viasat's grant for market access. The only exception is carrier wave testing that would occur under the parameters specified in Attachment 1. Moreover, other than changing the point of communication, each of the Earth Stations would be operated in a manner consistent with the technical parameters authorized for communications with ViaSat-3F1 from these locations under separate license. Furthermore, Viasat notes that it has completed coordination of each of the Earth Stations across an orbital arc that includes the 79.0° W.L. orbital location, which further limits any risk of harmful interference.

Viasat would operate pursuant to the STA on a non-protected, non-harmful interference basis. In the unlikely event of harmful interference caused by Viasat's operations under the STA, Viasat would take steps to eliminate such interference, including termination of transmissions if needed. The U.S. point of contact available 24 hours a day, seven days a week, with authority and ability to cease emissions is:

349 Inverness Drive South  
Englewood, CO 80112  
Tel: 720-493-7300

**Attachment 1**  
**Technical Parameters for IOT**

|                                                              |                                                            |
|--------------------------------------------------------------|------------------------------------------------------------|
| <b>Emission Designator</b>                                   | CW Tests: 1H00N0N<br>Modulated Tests: 464MG7D and 500MG7D  |
| <b>Uplink Bandwidth</b>                                      | Up to 600 MHz per carrier                                  |
| <b>Uplink Frequencies (MHz)</b>                              | 27.5-28.6 GHz, 29.5-30 GHz                                 |
| <b>Uplink Polarization</b>                                   | LHCP and RHCP                                              |
| <b>Antenna Gain</b>                                          | 52.5 dBi (1.8 m)<br>53.1 dBi (2.4 m)                       |
| <b>Maximum Uplink EIRP per Carrier (dBW)</b>                 | 67.6 dBW (1.8 m)<br>68.2 dBW (2.4 m)                       |
| <b>Maximum Uplink EIRP Density per Carrier (dBW/4 kHz)</b>   | CW Tests: 104.2 dBW/4kHz<br>Modulated Tests: 17.6 dBW/4kHz |
| <b>Emission Designator</b>                                   | CW Tests: 1H00N0N<br>Modulated Tests: 464MG7D and 500MG7D  |
| <b>Downlink Bandwidth</b>                                    | Up to 600 MHz per carrier                                  |
| <b>Downlink Frequencies (MHz)</b>                            | 17.7-18.8 GHz, 19.7-20.2 GHz                               |
| <b>Downlink Polarization</b>                                 | LHCP and RHCP                                              |
| <b>Maximum Downlink EIRP per Carrier (dBW)</b>               | 63 dBW                                                     |
| <b>Maximum Downlink EIRP Density per Carrier (dBW/4 kHz)</b> | CW Tests: 99.0 dBW/4kHz<br>Modulated Tests: 12.5 dBW/4kHz  |
| <b>Satellite Point of Communication</b>                      | ViaSat-3F2                                                 |
| <b>Satellite Call Sign</b>                                   | S3113                                                      |
| <b>Satellite Location</b>                                    | 79.0° W.L.                                                 |

### SAN Sites for IOT

| <b>City/State</b>     | <b>County</b>  | <b>Latitude</b> | <b>Longitude</b> | <b>Antenna Size (m)</b> | <b>Call Sign*</b> |
|-----------------------|----------------|-----------------|------------------|-------------------------|-------------------|
| Pomeroy, OH           | Meigs          | 39 03 35.24N    | 082 00 37.54W    | 1.8                     | E210141           |
| Canonsburg, PA        | Washington     | 40 18 05.03N    | 080 09 45.09W    | 1.8                     | E220181           |
| Chamblee, GA          | DeKalb         | 33 55 06.14N    | 084 17 46.96W    | 1.8                     | E210056           |
| Triadelphia, WV       | Ohio           | 40 02 38.10N    | 080 36 07.22W    | 1.8                     | E210312           |
| Saint Clairsville, OH | Belmont        | 40 04 55.84N    | 080 56 21.29W    | 1.8                     | E210072           |
| Cedartown, GA         | Polk           | 34 05 30.10N    | 085 14 34.06W    | 1.8                     | E210068           |
| Newark, OH            | Licking        | 40 04 07.28N    | 082 18 57.94W    | 1.8                     | E210078           |
| Frankfort, IN         | Clinton        | 40 25 52.82N    | 086 23 56.88W    | 1.8                     | E210346           |
| Calhoun, GA           | Gordon         | 34 28 51.22N    | 084 56 12.10W    | 2.4                     | E210064           |
| Greenfield, OH        | Highland       | 39 20 50.92N    | 083 23 00.21W    | 2.4                     | E210186           |
| Dalton, GA            | Whitfield      | 34 46 52.49N    | 084 53 13.97W    | 2.4                     | E210202           |
| Newcomerstown, OH     | Tuscarawas     | 40 15 16.37N    | 081 32 56.59W    | 2.4                     | E210077           |
| Caldwell, OH          | Noble          | 39 44 12.15N    | 081 31 20.57W    | 2.4                     | E210080           |
| Edinburg, VA          | Shenandoah     | 38 50 31.43N    | 078 33 19.77W    | 2.4                     | E210099           |
| Odon, IN              | Daviess        | 38 53 54.56N    | 086 55 26.81W    | 1.8                     | E210191           |
| Staunton, VA          | Augusta        | 38 02 28.22N    | 079 07 33.12W    | 1.8                     | E210098           |
| Huntingburg, IN       | Dubois         | 38 17 56.27N    | 086 57 59.14W    | 2.4                     | E210130           |
| Frankfort, IN         | Clinton        | 40 13 58.81N    | 086 39 21.82W    | 1.8                     | E210156           |
| Bedford, VA           | Bedford County | 37 19 21.07N    | 079 32 15.55W    | 2.4                     | E210325           |
| Oakland City, IN      | Gibson         | 38 20 24.32N    | 087 22 12.88W    | 2.4                     | E210055           |
| Bloomington, IN       | Monroe         | 39 10 26.52N    | 086 33 16.18W    | 1.8                     | E210209           |
| Kingston, OH          | Ross           | 39 28 38.27N    | 082 56 49.33W    | 1.8                     | E210088           |
| Stockport, OH         | Morgan         | 39 32 50.03N    | 081 48 43.43W    | 1.8                     | E210081           |
| Greensburg, IN        | Decatur        | 39 19 19.55N    | 085 19 36.50W    | 2.4                     | E210286           |

\* Call Signs are associated with existing authorizations to operate earth stations with the ViaSat-3F1 satellite and are included for informational purposes. Viasat does not seek to change operations authorized under these Call Signs through this STA request.

|                    |          |              |               |     |         |
|--------------------|----------|--------------|---------------|-----|---------|
| Albany, OH         | Meigs    | 39 10 29.37N | 082 17 17.39W | 2.4 | E210171 |
| Coolville, OH      | Athens   | 39 12 43.13N | 081 50 36.77W | 1.8 | E210187 |
| Thurman, OH        | Jackson  | 38 54 39.67N | 082 27 21.29W | 2.4 | E210249 |
| Ironton, OH        | Lawrence | 38 32 21.67N | 082 40 29.23W | 1.8 | E210250 |
| Batavia, OH        | Clermont | 39 04 53.12N | 084 09 04.77W | 2.4 | E210210 |
| Georgetown, OH     | Brown    | 38 51 38.69N | 083 53 12.49W | 2.4 | E210157 |
| Stout, OH          | Adams    | 38 40 08.37N | 083 23 49.18W | 2.4 | E210176 |
| Marysville, OH     | Union    | 40 09 27.09N | 083 14 02.20W | 2.4 | E210174 |
| Waynesfield, OH    | Auglaize | 40 37 46.27N | 083 58 23.04W | 1.8 | E210135 |
| Sidney, OH         | Shelby   | 40 15 53.91N | 084 04 25.48W | 1.8 | E210136 |
| Van Buren, OH      | Hancock  | 41 08 03.77N | 083 38 58.80W | 1.8 | E210159 |
| Decatur, IN        | Adams    | 40 48 13.80N | 084 52 49.86W | 1.8 | E210160 |
| Bowling Green, OH  | Wood     | 41 21 19.91N | 083 36 37.76W | 2.4 | E210237 |
| Wauseon, OH        | Fulton   | 41 32 50.42N | 084 09 28.50W | 1.8 | E210161 |
| Port Clinton, OH   | Ottawa   | 41 32 20.74N | 083 02 14.64W | 2.4 | E210177 |
| Sandusky, OH       | Erie     | 41 25 54.49N | 082 42 10.53W | 2.4 | E210195 |
| Lorain, OH         | Lorain   | 41 25 08.08N | 082 09 39.92W | 1.8 | E210163 |
| Cleveland, OH      | Cuyahoga | 41 31 38.97N | 081 39 13.99W | 2.4 | E210197 |
| Akron, OH          | Summit   | 41 08 13.21N | 081 35 44.81W | 2.4 | E210216 |
| Diamond, OH        | Portage  | 41 05 54.80N | 081 01 28.46W | 2.4 | E210243 |
| Kinsman, OH        | Trumbull | 41 26 35.40N | 080 33 26.78W | 1.8 | E210245 |
| Marion, OH         | Marion   | 40 33 14.66N | 083 06 49.86W | 2.4 | E210185 |
| West Milton, OH    | Miami    | 39 56 53.96N | 084 21 16.60W | 1.8 | E210246 |
| Eaton, OH          | Preble   | 39 45 25.58N | 084 38 15.46W | 2.4 | E210247 |
| Macon, GA          | Bibb     | 32 51 05.77N | 083 40 38.13W | 1.8 | E210280 |
| Cordele, GA        | Crisp    | 31 54 16.42N | 083 45 45.79W | 1.8 | E210297 |
| Newburgh, IN       | Warrick  | 37 57 59.97N | 087 22 39.01W | 1.8 | E210183 |
| St Paul, IN        | Decatur  | 39 24 35.61N | 085 34 25.30W | 2.4 | E210287 |
| Seymour, IN        | Scott    | 38 40 55.79N | 085 48 15.93W | 1.8 | E210170 |
| Jeffersonville, IN | Clark    | 38 19 02.42N | 085 43 04.27W | 1.8 | E210153 |

|                    |            |              |               |     |         |
|--------------------|------------|--------------|---------------|-----|---------|
| Milltown, IN       | Harrison   | 38 20 17.44N | 086 16 12.67W | 1.8 | E210164 |
| Crawfordsville, IN | Montgomery | 40 00 58.38N | 086 53 34.18W | 2.4 | E210190 |
| Greencastle, IN    | Putnam     | 39 41 22.63N | 086 52 21.87W | 1.8 | E210213 |
| Brazil, IN         | Clay       | 39 33 43.66N | 087 07 19.88W | 1.8 | E210169 |
| St. Joseph, IN     | Allen      | 41 09 26.70N | 085 03 44.35W | 2.4 | E210283 |
| Churubusco, IN     | Whitley    | 41 15 40.40N | 085 22 47.88W | 2.4 | E210317 |
| Crown Point, IN    | Lake       | 41 19 22.16N | 087 21 19.15W | 1.8 | E210155 |
| Chesterton, IN     | Porter     | 41 37 33.36N | 087 06 46.17W | 1.8 | E210175 |
| Monee, IL          | Will       | 41 27 38.00N | 087 44 38.70W | 2.4 | E210443 |
| Kankakee, IL       | Kankakee   | 41 07 24.36N | 087 51 43.46W | 2.4 | E210314 |
| Mt Pulaski, IL     | Logan      | 40 00 17.85N | 089 17 08.10W | 2.4 | E220177 |
| Marissa, IL        | St. Clair  | 38 14 59.25N | 089 45 30.58W | 2.4 | E210168 |
| Nashville, TN      | Davidson   | 36 13 52.81N | 086 36 03.63W | 2.4 | E210240 |
| Clarksville, TN    | Montgomery | 36 35 13.64N | 087 23 23.25W | 1.8 | E210144 |
| Wickliffe, KY      | Ballard    | 36 57 50.45N | 089 05 04.58W | 2.4 | E210221 |
| Atoka, TN          | Tipton     | 35 27 40.63N | 089 45 28.72W | 2.4 | E210151 |
| Memphis, TN        | Shelby     | 35 05 22.20N | 089 58 44.23W | 1.8 | E210146 |
| Marks, MS          | Quitman    | 34 17 55.08N | 090 16 27.28W | 2.4 | E210193 |
| Whittier, NC       | Swain      | 35 26 08.98N | 083 21 44.51W | 2.4 | E210315 |
| Murphy, NC         | Cherokee   | 35 01 42.02N | 084 09 46.22W | 2.4 | E210262 |
| Canton, GA, ID     | Cherokee   | 34 09 10.97N | 084 30 42.58W | 2.4 | E210275 |
| Old Fort, NC       | McDowell   | 35 39 46.07N | 082 07 30.80W | 1.8 | E210218 |
| Morganton, NC      | Burke      | 35 43 52.22N | 081 41 37.47W | 2.4 | E210203 |
| Stuart, VA         | Patrick    | 36 38 16.80N | 080 13 51.66W | 1.8 | E210278 |
| Glen Daniel, WV    | Raleigh    | 37 47 37.57N | 081 20 01.37W | 1.8 | E220183 |
| Benton Harbor, MI  | Berrien    | 42 05 17.22N | 086 26 18.12W | 1.8 | E210179 |
| Parma, MI          | Jackson    | 42 16 33.02N | 084 36 58.59W | 2.4 | E210215 |
| Wayland, MI        | Allegan    | 42 43 30.11N | 085 40 11.27W | 2.4 | E210180 |
| Holland, MI        | Ottawa     | 42 46 37.76N | 086 04 54.19W | 2.4 | E210313 |
| South Haven, MI    | Van Buren  | 42 22 54.49N | 086 16 23.24W | 2.4 | E210289 |

|                     |            |              |               |     |         |
|---------------------|------------|--------------|---------------|-----|---------|
| Holt, MI            | Ingham     | 42 38 17.22N | 084 29 29.85W | 2.4 | E210265 |
| Durand, MI          | Shiawassee | 42 54 38.16N | 084 00 51.50W | 1.8 | E210198 |
| Romeo, MI           | Macomb     | 42 48 05.13N | 083 00 18.75W | 2.4 | E210255 |
| Columbus, NC        | Polk       | 35 14 52.08N | 082 12 10.60W | 2.4 | E210295 |
| Greenville, SC      | Greenville | 34 49 35.68N | 082 24 43.26W | 1.8 | E210228 |
| Anderson, SC        | Anderson   | 34 30 19.41N | 082 38 53.24W | 2.4 | E210140 |
| West Jefferson, NC  | Ashe       | 36 22 36.94N | 081 28 38.44W | 1.8 | E210293 |
| Daleville, VA       | Botetourt  | 37 26 07.57N | 079 54 20.78W | 1.8 | E210322 |
| Tarrytown, GA       | Appling    | 31 55 56.57N | 082 20 57.62W | 1.8 | E210348 |
| Jackson River, VA   | Alleghany  | 37 46 45.84N | 079 53 25.08W | 2.4 | E220173 |
| Pickerington, OH    | Fairfield  | 39 54 23.16N | 082 44 01.31W | 1.8 | E220166 |
| Waterloo, IN        | DeKalb     | 41 26 11.04N | 085 02 41.37W | 2.4 | E210363 |
| Ligonier, IN        | Noble      | 41 27 52.06N | 085 33 27.05W | 2.4 | E210389 |
| Somonauk, IL        | LaSalle    | 41 37 49.16N | 088 40 05.82W | 2.4 | E210359 |
| North Utica, IL     | LaSalle    | 41 21 42.10N | 089 00 30.77W | 2.4 | E210387 |
| Morrison, IL        | Whiteside  | 41 47 24.47N | 089 57 52.54W | 1.8 | E210382 |
| Forreston, IL       | Ogle       | 42 08 29.93N | 089 37 32.68W | 2.4 | E210388 |
| Carlinville, IL     | Macoupin   | 39 15 33.50N | 089 54 15.26W | 2.4 | E210368 |
| Shuqualak, MS,      | Noxubee    | 32 59 19.32N | 088 34 21.36W | 1.8 | E210383 |
| Corinth, MS         | Alcorn     | 34 56 29.38N | 088 34 01.61W | 2.4 | E210369 |
| Ecu, MS             | Pontotoc   | 34 21 33.96N | 089 01 28.98W | 1.8 | E210332 |
| Pope Village, MS    | Panola     | 34 12 41.66N | 089 56 17.25W | 1.8 | E210370 |
| Winslow, IL         | Stephenson | 42 26 29.60N | 089 46 34.80W | 1.8 | E210390 |
| Augusta Springs, VA | Augusta    | 38 05 29.70N | 079 20 36.01W | 2.4 | E220165 |
| Hillsville, VA      | Carroll    | 36 47 30.25N | 080 43 00.31W | 1.8 | E210392 |
| Copper Hill, VA     | Floyd      | 37 07 03.54N | 080 07 57.48W | 1.8 | E210339 |
| Wytheville, VA      | Wythe      | 36 58 39.76N | 081 01 44.35W | 1.8 | E210393 |
| West Point, IN      | White      | 40 41 06.07N | 087 02 27.86W | 2.4 | E210385 |
| Noblesville, IN     | Hamilton   | 40 04 46.13N | 085 52 20.94W | 1.8 | E210338 |
| Mulberry Grove, IL  | Fayette    | 38 55 52.04N | 089 14 33.39W | 2.4 | E210371 |

|                    |            |              |               |     |         |
|--------------------|------------|--------------|---------------|-----|---------|
| Highland, IL       | Madison    | 38 44 52.17N | 089 40 14.34W | 2.4 | E210333 |
| Yazoo City, MS     | Yazoo      | 32 51 45.60N | 090 23 49.70W | 2.4 | E210381 |
| Leeds, AL,         | Jefferson  | 33 32 29.47N | 086 32 15.15W | 1.8 | E210401 |
| Fosters, AL        | Tuscaloosa | 33 05 34.48N | 087 41 05.54W | 1.8 | E220051 |
| Greene County, AL  | Greene     | 32 47 05.92N | 087 58 38.72W | 2.4 | E210244 |
| Newton, MS         | Newton     | 32 19 39.58N | 089 10 38.39W | 1.8 | E210361 |
| Moorefield, WV     | Hardy      | 39 04 40.47N | 078 55 59.39W | 1.8 | E210327 |
| Weston, WV         | Lewis      | 39 00 23.80N | 080 23 38.96W | 2.4 | E210378 |
| Morgantown, WV     | Monongalia | 39 38 02.36N | 079 55 35.38W | 1.8 | E210351 |
| California, PA     | Washington | 40 04 02.65N | 079 54 02.95W | 1.8 | E210344 |
| Fort Jennings, OH  | Putnam     | 40 56 47.27N | 084 15 24.03W | 1.8 | E210353 |
| Chelsea, MI        | Washtenaw  | 42 16 26.66N | 084 06 02.74W | 1.8 | E210408 |
| Tremont, MS        | Itawamba   | 34 13 42.01N | 088 15 27.12W | 1.8 | E260157 |
| Calera, AL         | Shelby     | 33 07 51.07N | 086 45 05.28W | 2.4 | E260155 |
| Champaign City, IL | Champaign  | 40 04 29.10N | 088 16 35.30W | 2.4 | E210456 |
| Decatur, IL        | Macon      | 39 52 56.45N | 088 53 53.78W | 1.8 | E210454 |
| Canton, OH         | Stark      | 40 51 33.14N | 081 25 05.39W | 1.8 | E210441 |
| London, KY         | Laurel     | 37 09 16.08N | 084 07 45.40W | 1.8 | E260141 |
| Dahlonega, GA      | Lumpkin    | 34 34 36.46N | 084 00 21.78W | 1.8 | E260135 |
| Braselton, GA      | Jackson    | 34 06 20.36N | 083 45 40.98W | 1.8 | E260131 |
| Columbia, KY       | Adair      | 37 08 16.56N | 085 18 08.28W | 2.4 | E260129 |
| Loretto, KY        | Marion     | 37 38 03.36N | 085 24 20.47W | 1.8 | E260161 |
| Tishomingo, MS     | Tishomingo | 34 38 15.59N | 088 13 57.91W | 1.8 | E210343 |
| Germantown, MD     | Montgomery | 39 12 03.92N | 077 16 13.17W | 2.4 | E260097 |