



## **Description of Request for Special Temporary Authority**

Viasat, Inc. (“Viasat”) respectfully requests a renewal of special temporary authority (“STA”) previously granted under call sign E050318<sup>1</sup> to operate the Ku band aperture of the KuKarray antenna for up to five (5) earth stations mounted on aircraft (“ESAAs”) in the 11.45-12.2 GHz and 14.0-14.5 GHz portions of the Ku band. These Ku band operations will occur in airspace outside of CONUS: (i) over the Pacific Ocean Region, Alaska and Hawaii using Eutelsat 174A at 174° W.L.<sup>2</sup> and (ii) over Latin America, Gulf of Mexico and the Caribbean using SES-10 at 67° W.L.<sup>3</sup> Viasat’s modification application with the Commission for regular authority to add operations with the Ku band aperture of this antenna to Viasat’s existing Ku band ESAA license, call sign E050318, remains pending.<sup>4</sup> That application was placed on public notice on May 13, 2020,<sup>5</sup> and the comment period has expired.

Viasat initiated operations under the previously renewed STA under call sign E050318. Therefore, Viasat requests a renewal of STA pending Commission action on that modification application, for a period of 60 days.

Grant of the requested STA will serve the public interest by allowing Viasat and its commercial airline customer to continue conducting acceptance testing and evaluation and to support the customer’s roll-out of service. STA would allow Viasat and its customer to evaluate user demands for high-speed in-flight broadband services on long-haul, international routes outside of CONUS and to prove out the antenna and network capabilities under typical use cases prior to full deployment of this antenna model.

All of the relevant technical parameters for the proposed STA operations are provided in the pending modification application and are incorporated by reference in this request for STA. Viasat demonstrates in the modification application that the Ku band aperture of this antenna complies with the limits in Section 25.218(f), except for certain limited exceedances in the plane perpendicular to the GSO arc, for which Viasat has requested a waiver to the extent necessary. Viasat provided a detailed technical analysis demonstrating that the Ku band operations of this antenna are unlikely to cause harmful interference into NGSO systems, and that these exceedances are highly unlikely to be perceptible to such systems given the dynamic environment in which ESAAs and NGSO satellites operate, particularly given the limited

---

<sup>1</sup> See File No. SES-STA-20200512-00525, Call Sign E050318

<sup>2</sup> See File No. SAT-PPL-20160117-00005, Call Sign S2950 (market access grant for SES-10).

<sup>3</sup> See File No. SAT-RPL-20170927-00136, Call Sign S2610 (authorization for Eutelsat 174A).

<sup>4</sup> See File No. SES-MFS-20200204-00112, Call Sign E050318

<sup>5</sup> See Report No.SES-02266, May 13, 2020



number of units for which STA is requested and the limited number of Ku band NGSO satellites that may be operational during the STA period.

Viasat will operate pursuant to STA on a non-protected, non-harmful interference basis. Viasat will otherwise operate consistently with the terms and conditions set forth in its existing Ku band ESAA license, call sign E050318 and in compliance with the requirements of Section 25.228 applicable to ESAAs.

The U.S. point of contact available 24 hours a day, seven days a week, with authority and ability to cease all emissions from the ESAAs is:

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