

June 24, 2024

**Utah Public Service Commission
Heber M. Wells Building
160 East 300 South
Salt Lake City, UT 84111**

RE: Viasat Carrier Services, Inc. – 2024 FCC Form 481 – Annual High-Cost Filing for SAC 509022 in Docket No. 24-999-05; 2024 High-Cost Recertification Request for Action and Officer Attestation - Docket No: 18-2610-01

Dear Staff,

Pursuant to FCC requirements under 47 C.F.R. §§ 54.313 & 54.422, enclosed please find for filing a copy of Viasat Carrier Services, Inc.'s 2024 submitted FCC Form 481 - Annual Eligible Telecommunications Carrier Certification for SAC 509022.

At the same time, Viasat Carrier Services (Docket No. 18-2610-01) submits the attached Officer Attestation certifying the appropriate past and future use of High-Cost Funds and Action Request for the Commission to include Viasat in its recertification verification to USAC and the FCC for 2025 funding.

Please do not hesitate to contact the undersigned directly with any questions about this report at map@compliancegroup.com.

Respectfully Submitted,



Marsha A. Pokorny
Senior Managing Consultant on behalf of Viasat Carrier Services, Inc.





AFFIDAVIT

State of California

County of San Diego


BEFORE ME, the undersigned authority appeared Robert Blair, who deposed and said:

My name is Robert Blair, I am the President and Secretary of Viasat Carrier Services, Inc. ("Company"). I am authorized to execute this affidavit on behalf of the Company. This affidavit is being given to support the Utah Public Service Commission's certification as contemplated in 47 C.F.R. §54.314.

Pursuant to the requirements of 47 C.F.R. § 54.314, Viasat Carrier Services, Inc. hereby certifies that it is eligible to receive federal high-cost support for the program years cited.

1. The Company certifies that it only used high-cost support received in Utah during the preceding calendar year **(2023)** for the provision, maintenance and upgrading of facilities and services for which support is intended.
2. Further, the Company certifies that all federal high-cost support provided to the Company in Utah will be used in the coming calendar year **(2025)** only for the provision, maintenance, and upgrading of facilities and services for which it is intended .

FURTHER AFFIANT SAYETH NOT.



Robert Blair
President and Secretary
Viasat Carrier Services, Inc.

Please See Attached Notary



California Jurat with Affiant
Statement

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California

County of San Diego

Subscribed and sworn to (or affirmed) before me on this 24 day of June, 2024.

By Robert Blair proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.



Kimbra L. Doyle
Signature of Notary Public

ACTION REQUEST

Date: June 24, 2024

FROM: Public Service Commission

Due: September 1, 2024*

SUBJECT: Viasat Carrier Services, Inc. – Annual ETC Recertification, Request

Docket No. 18-2610-01

(Company Name, Case Number, etc.)

6/XX/2023

REQUEST FOR AGENCY ACTION, RE: ANNUAL ETC CERTIFICATION Viasat Carrier Services, Inc. ("Viasat") requests that the Public Service Commission of Utah Certify to the Federal Communications Commission and to the Universal Service Administrative Company that Viasat is Certified to Receive Federal Universal Service Funding for Calendar Year 2025.

This is a request for the Division of Public Utilities (DPU) to provide analysis, evaluation results, and the basis for conclusions and recommendations regarding the following:

- X Review for Compliance and Make Recommendations
- Review Application and Make Recommendations
- Review the Complaint and Indicate whether the DPU has a Recommendation
- Review Notice and Make Recommendations
- X Review Request for Agency Action and Make Recommendations
- Respond in Accordance with the Notice of Filing and Request for Comments
- Investigate
- Other – Explanation and Statement of Issues to be Addressed (See Below):

*In the event the PSC issues an order or notice providing dates for comments and/or testimony in this docket:

- The DPU shall respond consistent with the order or notice;
- The order or notice, including any deadlines, shall supersede and replace this action request; and
- This action request shall be deemed withdrawn.

Viasat

FCC Form 481

State: UT

OMB Control #: 3060-0986 (High Cost) &

Sac: 509022

3060-0819 (Low Income), December 2020

498 ID: 143051764

Program Year: 2025

Filing Type and Contact Info

Filing Type

This information has been preselected based on High Cost and Lifeline program support paid out in the previous calendar year. If you think the filing type is incorrect, [please contact USAC](#).



High Cost (Section 54.313)



Lifeline (Section 54.422)

Contact Information

Include contact information for the person best able to answer questions about this form.

Contact Name (030)

Phone # (035)

(xxx) xxx-xxxx

Ext. (optional)

Contact Email Address (039)

Viasat

State: UT

Sac: 509022

498 ID: 143051764

OMB Control #: 3060-0986 (High Cost) &

3060-0819 (Low Income), December 2020

Program Year: 2025

Service Outage Reporting (Voice) (200)

Reportable Outages

For the prior calendar year, were there any reportable voice service outages? (210)

☐

Yes

☐

No

Upload Service Outage Data (220)

[Service Outage Data Template](#)



CSV only

Viasat

FCC Form 481

State: UT

OMB Control #: 3060-0986 (High Cost) &

Sac: 509022

3060-0819 (Low Income), December 2020

498 ID: 143051764

Program Year: 2025

Number of Complaints per 1,000 Customers (400)

Report Voice Complaints

How you would like to report voice complaints (zero or greater) for voice telephony service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize. (400)

Enter complaints per 1000 customers for fixed voice (410)

Enter complaints per 1000 customers for mobile voice (420)

Viasat

FCC Form 481

State: UT

OMB Control #: 3060-0986 (High Cost) &

Sac: 509022

3060-0819 (Low Income), December 2020

498 ID: 143051764

Program Year: 2025

Compliance with Service Quality Standards and Consumer Protection Rules (500)

Certify

Compliance with Minimum Service Standards (515)

Does the carrier comply with applicable minimum service standards?

☐

Yes

☐

No

Viasat

State: UT

Sac: 509022

498 ID: 143051764

OMB Control #: 3060-0986 (High Cost) &

3060-0819 (Low Income), December 2020

Program Year: 2025

Functionality in Emergency Situations (600)

Certify

Functionality in Emergency Situations Certification (600)

Is the carrier able to function in emergency situations?



Yes



No

Descriptive Document for Functionality in Emergency Situations (610)



610_509022 UT 61.pdf (65 KB)



PDF only

Viasat

FCC Form 481

State: UT

OMB Control #: 3060-0986 (High Cost) &

Sac: 509022

3060-0819 (Low Income), December 2020

498 ID: 143051764

Program Year: 2025

Operating Companies (800)

Carrier Names

Reporting Carrier (810)

Holding Company (811)



ViaSat, Inc.

Validate the information listed above (811) by selecting one of the following:



Holding Company/Affiliate name listed above is correct. (811A)



Holding Company/Affiliate name listed above is NOT correct. (811B)

The correct Holding Company/Affiliate name is (811C):



This study area does not have a Holding Company/Affiliate name. (811D)

Operating Company

Operating Company (812)

Upload Operating Company Data (813A, 813B, 813C) (Optional)

[Operating Company Data Template](#) 

CSV only

Viasat

FCC Form 481

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3060-0819 (Low Income), December 2020

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Program Year: 2025

Tribal Lands Reporting (900)

Tribal Land Services

Does the filing entity offer Tribal land services? (900)



Yes



No

Tribal Land(s) on which ETC Serves (910)

Navajo Nation
Paiute Indian Tribe of Utah
Ute Mountain Ute Tribe

Tribal Government Engagement Obligation
(920)



920_509022 UT 92.pdf (176 KB)



PDF only

Confirm Statuses

Select Yes, No, or NA for each of the below to confirm the status described on the attached PDF (920)
demonstrates coordination with the Tribal government pursuant to Section 54.313(a)(5) includes:

Needs assessment and deployment planning with a focus on Tribal community anchor institutions (921)



Yes



No



NA

Feasibility and sustainability planning (922)



Yes



No



NA

Marketing services in a culturally sensitive manner (923)



Yes



No



NA

Compliance with Rights of way processes (924)



Yes



No



NA

Viasat

State: UT

Sac: 509022

498 ID: 143051764

OMB Control #: 3060-0986 (High Cost) &

3060-0819 (Low Income), December 2020

Program Year: 2025

Compliance with Land Use permitting requirements (925)



Yes



No



NA

Compliance with Facilities Siting rules (926)



Yes



No



NA

Compliance with Environmental Review processes (927)



Yes



No



NA

Compliance with Cultural Preservation review processes (928)



Yes



No



NA

Compliance with Tribal Business and Licensing requirements (929)



Yes



No



NA

Viasat

FCC Form 481

State: UT

OMB Control #: 3060-0986 (High Cost) &

Sac: 509022

3060-0819 (Low Income), December 2020

498 ID: 143051764

Program Year: 2025

Voice and Broadband Service Rate Comparability (1000)

Certify Voice

Voice Services Rate Comparability Certification (1000)

Is the carrier's pricing of fixed voice services no more than two standard deviations above the applicable national average urban rate for voice service? If you answer No to line 1000, please provide an explanation for non-compliance.



Yes



No



Not Applicable

Attach Detailed Description for Voice Services Rate Comparability Compliance (1010)



1010_509022 UT 1.pdf (67 KB)

PDF, XLS, XLSX only

Certify Broadband

Broadband Comparability Certification (1020)

Does the carrier's broadband services pricing meet one of the following criteria? If you answer No to line 1020, please provide an explanation for non-compliance.



Yes - Pricing is no more than the most recent applicable benchmark announced by the Wireline Competition Bureau.



Yes - Pricing is no more than the non-promotional price charged for a comparable fixed wireline service in urban areas in the states or U.S. Territories where the eligible telecommunications carrier receives support.



No - Unable to certify broadband rate comparability



Not Applicable.



Yes - CETC Alaska Plan participant certifies that one plan it offers is substantially similar to a service plan offered by at least one mobile wireless service provider in the cellular market area of Anchorage, Alaska and offered for the same or a lower rate than the matching plan in the cellular market area.

Viasat

State: UT

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Program Year: 2025

Attach Detailed Description for Broadband Rate Comparability Compliance (1030)

 1030_509022 UT 1.pdf (95 KB) 

PDF, XLS, XLSX only

Viasat

FCC Form 481

State: UT

OMB Control #: 3060-0986 (High Cost) &

Sac: 509022

3060-0819 (Low Income), December 2020

498 ID: 143051764

Program Year: 2025

Terrestrial Backhaul Reporting (1100)

Certify

Terrestrial Backhaul Certification (1100)

Do terrestrial backhaul options exist?

☒

Yes

☐

No

Select the appropriate response to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to Section 54.313(g) (1130)

☐

Yes

☐

No

☐

Not Applicable

Alaska Plan Satellite Backhaul Certification (1140)

Is the carrier providing service consistent with its approved performance plan in the portion(s) of its study area that relies exclusively on satellite backhaul?

☐

Yes

☐

No

☐

Not Applicable

Viasat

FCC Form 481

State: UT

OMB Control #: 3060-0986 (High Cost) &

Sac: 509022

3060-0819 (Low Income), December 2020

498 ID: 143051764

Program Year: 2025

Lifeline Terms and Conditions (1200)

Upload Document or Link Website

Upload a descriptive document(s) AND/OR reference a specific link to your company's website.

Terms & Conditions of Voice Telephony Lifeline Plans (1210)

PDF only

AND/OR

Link to Public Website(1220)

Confirm Information

Check these boxes below to confirm that the attached PDF, on line 1210, or the website listed, on line 1220, contains the required information pursuant to Section 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

- ☐ Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers (1221)
- ☐ Details on the number of minutes provided as part of the plan (1222)
- ☐ Additional charges for toll calls, and rates for each such plan (1223)

Viasat

FCC Form 481

State: UT

OMB Control #: 3060-0986 (High Cost) &

Sac: 509022

3060-0819 (Low Income), December 2020

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Program Year: 2025

Price Cap Data (2005)

Certify

Select the appropriate responses below to note compliance as a recipient of frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR 54.313(c), (d),(e). The information reported on this form and in the documents attached below is accurate.

Price Cap Carrier Receiving Frozen Support Certification (2015)

Does the carrier certify compliance with the requirements in 47 CFR Section 54.312(a)?

☐

Yes

☐

No

☐

NA

Price Cap Carrier Connect America ICC Support (2016)

Does the carrier certify compliance with the requirements in 47 CFR Section 54.313(d)?

☐

Yes

☐

No

☐

NA

Enter total amount of Phase II support, if any, that the price cap carrier used for capital expenditures in 2022. (2017C)

\$x.xx

Price Cap Community Anchor Institutions (2018A)

Indicate if the carrier newly deployed broadband service to community anchor institution(s) in the previous calendar year.

☐

Yes - Attach New Community Anchors

☐

No - No New Community Anchors

☐

Not Applicable - No Attachment Required

Please Provide Attachment (2018B)

Attach a document to this line to provide the number, names and addresses of community anchor institutions to which the recipient newly began providing access to broadband service in the preceding calendar year.

Viasat

State: UT

Sac: 509022

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[Community Anchor Template](#) 

XLSM only

Viasat

FCC Form 481

State: UT

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Sac: 509022

3060-0819 (Low Income), December 2020

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Rate of Return Data (3005)

Certify

Select from the drop down menus or check the boxes below to note compliance with 54.313(f)(1). Privately held carriers must ensure compliance with the financial reporting requirements set forth in 47 CFR 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

Does this filing retain a Cost Consultant and/or Firm, or other Third Party to prepare financial and operations data disclosures submitted to the National Exchange Carrier Association (NECA), USAC, or the Administrator? (3007)

☐

Yes

☐

No

Name of Consultant (3007A)

Name of Consultant Firm/Third Party (3007B)

[+Another Consultant](#)

Certification of Public Interest Obligations (3010A)

Does the carrier certify compliance with the requirements in 47 CFR Sections 54.313(f)(1)(i)?

☐

Yes - Attach Explanation

☐

No - Attach Explanation

☐

Not Applicable - No Attachment Required

Please Provide Attachment (3010B)

PDF, XLS, XLSX, DOC, DOCX only

Rate-of-Return Community Anchor Institutions (3012A)

Indicate if the carrier newly deployed broadband service to community anchor institution(s) in the previous calendar year.

☐

Yes - Attach New Community Anchors

☐

No - No New Community Anchors

☐

Not Applicable - No Attachment Required

Please Provide Attachment (3012B)

Viasat

FCC Form 481

State: UT

OMB Control #: 3060-0986 (High Cost) &

Sac: 509022

3060-0819 (Low Income), December 2020

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Using link, download template and list the number, name and address for each community anchor institution. As required by 47 CFR Section 54.313(f)(1)(ii), attach the document which contains the community anchor institution details.

[Community Anchor Template](#) 

XLSM only

As defined in 47 CFR Section 54.313(f)(2), is your company a Privately Held ROR Carrier? (3013)

☐

Yes

☐

No

Does your company file the RUS annual report? (3014)

☐

Yes

☐

No

Please check these boxes to confirm that the attached document(s), on line 3017, contains the required information pursuant to Section 54.313(f)(2) compliance requires:

☐

Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers) (3015)

☐

Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows (3016)

Annual Report (3017)

PDF, XLS, XLSX, DOC, DOCX only

Is your company audited? (3018)

☐

Yes

☐

No

Viasat

FCC Form 481

State: UT

OMB Control #: 3060-0986 (High Cost) &

Sac: 509022

3060-0819 (Low Income), December 2020

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pursuant to § 54.313(f)(2), contains:

- ☐ Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers (3019)
- ☐ Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows (3020)
- ☐ Management letter and/or audit opinion issued by the independent certified public accountant that performed the company's financial audit (3021)
- ☐ Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers (3022)
- ☐ Underlying information subjected to a review by an independent certified public accountant (3023)
- ☐ Underlying information subjected to an officer certification (3024)
- ☐ Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows (3025)

Worksheet Listing (3026)

PDF, XLS, XLSX, DOC, DOCX only

Financial Data Summary

Enter the specified financial data below which is located on your RUS Report (attached on Line 3017) or your reviewed/audited financial statements (attached on Line 3026).

Revenue (3027)**Operating Expenses (3028)****Net Income (3029)****Telephone Plant In Service (TPIS) (3030)****Total Assets (3031)**

Viasat

State: UT

Sac: 509022

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3060-0819 (Low Income), December 2020

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Total Debt (3032)

Total Equity (3033)

Dividends (3034)

Viasat

FCC Form 481

State: UT

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Sac: 509022

3060-0819 (Low Income), December 2020

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Rural Broadband Experiment Data (4005)

Certify

Public Interest Obligations (4001)

Per FCC 14-98 (paragraphs 26-29 and 78), recipient certifies that it is offering broadband meeting the requisite public interest obligations consistent with the category for which they were selected, including broadband speed, latency, usage capacity, and rates that are reasonably comparable to rates for comparable offerings in urban areas.

☐

Yes

☐

No

RBE Community Anchor Institutions (4003A)

Indicate if the carrier newly deployed broadband service to community anchor institution(s) in the previous calendar year.

☐

Yes - Attach New Community Anchors

☐

No - No New Community Anchors

Please Provide Attachment (4003B)

Using link, download template and list the number, name and address for each community anchor institution. As required by FCC 14-98 (paragraph 79), attach the document which contains the community anchor institution details.

[Community Anchor Template](#)

XLSM only

Viasat

FCC Form 481

State: UT

OMB Control #: 3060-0986 (High Cost) &

Sac: 509022

3060-0819 (Low Income), December 2020

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Alaska Plan Participants (5005)

Certify Terrestrial Backhaul

Newly Available Terrestrial or other Satellite Backhaul (RoR Carriers) (5011)

Indicate whether any terrestrial backhaul or other satellite backhaul became commercially available in the previous calendar year in areas previously served exclusively by performance-limiting satellite backhaul.

☐ Yes ☐ No

Newly Available Terrestrial or other Satellite Backhaul (CETC Carriers) (5012)

If the filing carrier identified in its approved performance plans that it relies exclusively on satellite backhaul for a certain portion of the population in its service area, indicate whether any terrestrial backhaul or other satellite backhaul became commercially available in the previous calendar year in areas that were previously served exclusively by satellite backhaul.

☐ Yes ☐ No

Upload Backhaul Technology Data (5013A - 5013C)

[Backhaul Data Template](#) 

CSV only

Viasat

FCC Form 481

State: UT

OMB Control #: 3060-0986 (High Cost) &

Sac: 509022

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Program Year: 2025

Phase II Auction Reporting (6005)**Certify**

Enter the total amount of Phase II Auction Support, if any, the carrier used for capital expenditures. (6010)

\$x.xx

New York Funds Certification (6011)

Certify regarding whether the recipient has available funds for all project costs that will exceed the amount of support that will be received for the next calendar year. This certification must be provided starting the first July 1 after receiving support until the recipient's penultimate year of support.

☒ Yes ☐ No**Community Anchor Institutions (6012a)**

Indicate if the carrier newly deployed broadband service to community anchor institution(s) in the previous calendar year.

☐ Yes - Attach New Community Anchor ☒ No - No New Community Anchor

Using the template, upload a document with a number, name and address for each community anchor institution. (6012b)

[Community Anchor Template](#) 

XLSM only

FCC Form 470 Postings (6013)

For the filing due July 1 following full implementation of this requirement answer this certification request.

☐ Yes ☐ No ☒ Not Applicable**Post-Final Deployment Milestone Performance Certification (6014)**

Viasat

State: UT

Sac: 509022

498 ID: 143051764

OMB Control #: 3060-0986 (High Cost) &
3060-0819 (Low Income), December 2020

Program Year: 2025

Starting the first July 1 after meeting the final service milestone, certify that the Phase II-funded network that the Phase II auction recipient operated in the prior year meets the relevant performance requirements in Section 54.309.



Yes



No



Not Applicable

Viasat

State: UT

Sac: 509022

498 ID: 143051764

OMB Control #: 3060-0986 (High Cost) &
3060-0819 (Low Income), December 2020

Program Year: 2025

Phase-Down Support Reporting (7005)**Certify****Price Cap Carrier and Fixed Competitive Eligible Telecommunications Carrier Transitional Support Requirement Certification. (7010)**

This certification request applies to any price cap carrier or fixed competitive eligible telecommunications carrier that elects to continue receiving support pursuant to Section 54.312(d) or Section 54.307(e)(2)(iii) starting July 1, 2020, and annually thereafter on July 1 for each subsequent year they receive such support. These carriers must use this support throughout specific high-cost and extremely high-cost census blocks where they continue to have the federal high-cost ETC obligation to provide voice service pursuant to Section 54.201(d) at rates that are reasonably comparable to comparable offerings in urban areas. Per Section 54.313(m), does the carrier certify that they used all such support received in the previous year to provide voice service in compliance with the above obligation?

☐

Yes

☐

No

Viasat

FCC Form 481

State: UT

OMB Control #: 3060-0986 (High Cost) &

Sac: 509022

3060-0819 (Low Income), December 2020

498 ID: 143051764

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PART 2: RFP FIXED AND MOBILE FUNDS CERTIFICATION (8009)

Certify Fixed

Capital Expenditures (8010)

Enter the total amount of Uniendo a Puerto Rico Stage 2 fixed support, if any, the carrier used for capital expenditures.

\$x.xx

Available Funds Certification (8011)

Certify (either yes or no) regarding whether the recipient has available funds for all project costs that will exceed the amount of support that will be received for the next calendar year. This certification must be provided starting the first July 1 after receiving support until the recipient's penultimate year of support.

☐ Yes ☐ No

Community Anchor Institutions (8012A)

Indicate if the carrier newly deployed broadband service to community anchor institution(s) in the previous calendar year.

☐ Yes - Attach New Community Anchors ☐ No - No New Community Anchors

Please Provide Attachment (8012B)

Using link, download template and list the number, name and address for each community anchor institution. As required by 47 CFR Section 54.313(e)(2)(i)(A), attach the document which contains the community anchor institution details.

[Community Anchor Template](#) 

XLSM only

FCC Form 470 Postings (8013)

Viasat

FCC Form 481

State: UT

OMB Control #: 3060-0986 (High Cost) &

Sac: 509022

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For the filing due July 1 following full implementation of this requirement answer yes, no, or not applicable to this certification request.

☐ Yes ☐ No ☐ Not Applicable

Post-Final Deployment Milestone Performance Certification (8014)

Starting the first July 1 after meeting the final service milestone, certify (yes or no) that the Uniendo a Puerto Rico Stage 2-funded network that the Stage 2 recipient operated in the prior year meets the relevant performance requirements in Section 54.309.

☐ Yes ☐ No ☐ Not Applicable

Support Reimbursement Certification (8020)

54.313(n): Recipients of Uniendo a Puerto Rico Fund Stage 2 fixed support shall certify that such support was not used for costs that are (or will be) reimbursed by other sources of support, including of federal or local government aid or insurance reimbursements; and that support was not used for other purposes, such as the retirement of company debt unrelated to eligible expenditures, or other expenses not directly related to network restoration, hardening, and expansion consistent with the framework of the Uniendo a Puerto Rico Fund.

☐ Yes ☐ No

Disaster Preparedness and Response Documentation (8030)

54.313(n): Recipients of fixed support from Stage 2 of the Uniendo a Puerto Rico Fund shall certify that they have conducted an annual review of the documentation required by section 54.1515(a)-(c) to determine the need for and to implement changes or revisions to disaster preparation and recovery documentation.

☐ Yes ☐ No

Certify Mobile

Support Reimbursement (8040)

Viasat

FCC Form 481

State: UT

OMB Control #: 3060-0986 (High Cost) &

Sac: 509022

3060-0819 (Low Income), December 2020

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54.313(n): Recipients of Uniendo a Puerto Rico Fund Stage 2 mobile support shall certify that such support was not used for costs that are (or will be) reimbursed by other sources of support, including of federal or local government aid or insurance reimbursements; and that support was not used for other purposes, such as the retirement of company debt unrelated to eligible expenditures, or other expenses not directly related to network restoration, hardening, and expansion consistent with the framework of the Uniendo a Puerto Rico Fund.

☐ Yes ☐ No

Disaster Preparedness and Response Documentation (8050)

54.313(n): Recipients of mobile support from Stage 2 of the Uniendo a Puerto Rico Fund shall certify that they have conducted an annual review of the documentation required by section 54.1515(a)-(c) to determine the need for and to implement changes or revisions to disaster preparation and recovery documentation.

☐ Yes ☐ No

Mobile Disbursements Certification (8060)

54.313(o): Recipients of Uniendo a Puerto Rico Fund Stage 2 mobile support shall certify that they are in compliance with all requirements for receipt of such support to continue receiving Stage 2 mobile disbursements.

☐ Yes ☐ No

Transitional Support (8070)

Recipients of transitional support under Section 54.1516 shall certify that such support was not used for costs that are or will be reimbursed by other sources of support, or expenses not directly related to network restoration, hardening, and expansion consistent with the framework of the Uniendo a Puerto Rico Fund. Transitional support recipients shall certify that they have conducted an annual review to determine that their disaster preparation and recovery documentation is up to date, as required by Section 54.1515(a) through (c) or Section 54.1524. Answer yes or no if carrier is compliant with 54.313(q).

☐ Yes ☐ No

Spending Plans for Recipients of Legacy Frozen Phase-Down Support (8080)

For annual reports due in 2024, 2025, and 2026, recipients of frozen high cost support under Section 54.1504(b)

Viasat

State: UT

Sac: 509022

498 ID: 143051764

OMB Control #: 3060-0986 (High Cost) &
3060-0819 (Low Income), December 2020

Program Year: 2025

For annual reports due in 2024, 2025, and 2026, recipients of frozen high-cost support under Section 54.1504(b) shall certify that such support received after June 1, 2023 was used for resiliency and redundancy measures and to maintain their voice and broadband network footprint.

☐

Yes

☐

No

Viasat

FCC Form 481

State: UT

OMB Control #: 3060-0986 (High Cost) &

Sac: 509022

3060-0819 (Low Income), December 2020

498 ID: 143051764

Program Year: 2025

Certify Fixed**Capital Expenditures (9010)**

Enter the total amount of Connect USVI Fund Stage 2 fixed support, if any, the carrier used for capital expenditures.

\$x.xx

Available Funds Certification (9011)

Certify (either yes or no) regarding whether the recipient has available funds for all project costs that will exceed the amount of support that will be received for the next calendar year. This certification must be provided starting the first July 1 after receiving support until the recipient's penultimate year of support.

☐

Yes

☐

No

Community Anchor Institutions (9012A)

Indicate if the carrier newly deployed broadband service to community anchor institution(s) in the previous calendar year.

☐

Yes - Attach New Community Anchors

☐

No - No New Community Anchors

Please Provide Attachment (9012B)

Using link, download template and list the number, name and address for each community anchor institution. As required by 47 CFR Section 54.313(e)(2)(i)(A), attach the document which contains the community anchor institution details.

[Community Anchor Template](#) 

XLSM only

FCC Form 470 Postings (9013)

For the filing due July 1 following full implementation of this requirement answer yes, no, or not applicable to this

Viasat

FCC Form 481

State: UT

OMB Control #: 3060-0986 (High Cost) &

Sac: 509022

3060-0819 (Low Income), December 2020

498 ID: 143051764

Program Year: 2025

For the filing due July 1 following full implementation of this requirement answer yes, no, or not applicable to this certification request.

☐ Yes ☐ No ☐ Not Applicable

Post-Final Deployment Milestone Performance Certification (9014)

Starting the first July 1 after meeting the final service milestone, certify (yes or no) that the Connect USVI Fund Stage 2-funded network that the Stage 2 recipient operated in the prior year meets the relevant performance requirements in Section 54.309.

☐ Yes ☐ No ☐ Not Applicable

Support Reimbursement Certification (9020)

54.313(n): Recipients of Connect USVI Fund Stage 2 fixed support shall certify that such support was not used for costs that are (or will be) reimbursed by other sources of support, including of federal or local government aid or insurance reimbursements; and that support was not used for other purposes, such as the retirement of company debt unrelated to eligible expenditures, or other expenses not directly related to network restoration, hardening, and expansion consistent with the framework of the Connect USVI Fund.

☐ Yes ☐ No

Disaster Preparedness and Response Documentation (9030)

54.313(n): Recipients of fixed support from Stage 2 of the Connect USVI Fund shall certify that they have conducted an annual review of the documentation required by section 54.1515(a)-(c) to determine the need for and to implement changes or revisions to disaster preparation and recovery documentation.

☐ Yes ☐ No

Certify Mobile

Support Reimbursement (9040)

54.313(n): Recipients of Connect USVI Fund Stage 2 mobile support shall certify that such support was not used for costs

Viasat

FCC Form 481

State: UT

OMB Control #: 3060-0986 (High Cost) &

Sac: 509022

3060-0819 (Low Income), December 2020

498 ID: 143051764

Program Year: 2025

54.313(n): Recipients of Connect USVI Fund Stage 2 mobile support shall certify that such support was not used for costs that are (or will be) reimbursed by other sources of support, including of federal or local government aid or insurance reimbursements; and that support was not used for other purposes, such as the retirement of company debt unrelated to eligible expenditures, or other expenses not directly related to network restoration, hardening, and expansion consistent with the framework of the Connect USVI Fund.

☐ Yes ☐ No

Disaster Preparedness and Response Documentation (9050)

54.313(n): Recipients of mobile support from Stage 2 of the Connect USVI Fund shall certify that they have conducted an annual review of the documentation required by Section 54.1515(a)-(c) to determine the need for and to implement changes or revisions to disaster preparation and recovery documentation.

☐ Yes ☐ No

Mobile Disbursements Certification (9060)

54.313(o): Recipients of Connect USVI Fund Stage 2 mobile support shall certify that they are in compliance with all requirements for receipt of such support to continue receiving Stage 2 mobile disbursements.

☐ Yes ☐ No

Transitional Support (9070)

Recipients of transitional support under Section 54.1516 shall certify that such support was not used for costs that are or will be reimbursed by other sources of support, or expenses not directly related to network restoration, hardening, and expansion consistent with the framework of the Connect USVI Fund. Transitional support recipients shall certify that they have conducted an annual review to determine that their disaster preparation and recovery documentation is up to date, as required by Section 54.1515(a) through (c) or Section 54.1524. Answer yes or no if carrier is compliant with 54.313(q).

☐ Yes ☐ No

Spending Plans for Recipients of Legacy Frozen Phase-Down Support (9080)

For annual reports due in 2024, 2025, and 2026, recipients of frozen high-cost support under Section 54.1504(b)

Viasat

State: UT

Sac: 509022

498 ID: 143051764

OMB Control #: 3060-0986 (High Cost) &
3060-0819 (Low Income), December 2020

Program Year: 2025

shall certify that such support received after June 1, 2023 was used for resiliency and redundancy measures and to maintain their voice and broadband network footprint.

☐

Yes

☐

No

Viasat

FCC Form 481

State: UT

OMB Control #: 3060-0986 (High Cost) &

Sac: 509022

3060-0819 (Low Income), December 2020

498 ID: 143051764

Program Year: 2025

Certify RDOF**Capital Expenditures (10010)**

Starting the first July 1 after receiving support until the July 1 after the recipient's support term has ended, recipients of Rural Digital Opportunity Fund support must submit the total amount of support, if any, the recipient used for capital expenditures in the previous calendar year. This is required by 47 C.F.R. Section 54.313(e)(2)(i)(B).

\$x.xx

Available Funds Certification (10011)

Please provide a response (either yes or no) to this certification request for any recipient of Rural Digital Opportunity Fund support that the recipient has available funds for all project costs that will exceed the amount of support that will be received for the next calendar year. This certification must be provided starting the first July 1 after receiving support until the recipient's penultimate year of support, as required by required by 47 C.F.R. Section 54.313(e)(2)(ii).

☐ Yes ☐ No

Community Anchor Institutions (10012A)

Recipients of Rural Digital Opportunity Fund support must attach a list containing the number, names, and addresses of community anchor institutions to which the eligible telecommunications carrier newly began providing access to broadband service in the preceding calendar year. This filing is required by 47 C.F.R. Section 54.313(e)(2)(i)(A).

☐ Yes - Attach New Community Anchors ☐ No - No New Community Anchors

Please Provide Attachment (10012B)

Using link, download template and list the number, name and address for each community anchor institution. As required by 47 CFR Section 54.313(e)(2)(i)(A), attach the document which contains the community anchor institution details.

[Community Anchor Template](#) 

Viasat

FCC Form 481

State: UT

OMB Control #: 3060-0986 (High Cost) &

Sac: 509022

3060-0819 (Low Income), December 2020

498 ID: 143051764

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XLSM only

FCC Form 470 Postings (10013)

For the filing due July 1st following full implementation of this requirement, please provide a response (either yes, no, or not applicable) to this certification request. Recipients of Rural Digital Opportunity Fund must respond affirmatively that they bid on category one telecommunications and Internet access services in response to all FCC Form 470 postings seeking broadband service that meets the connectivity targets for the schools and libraries universal service support program for eligible schools and libraries (as described in Section 54.501) located within any area in a census block where the carrier is receiving Rural Digital Opportunity Fund, and that such bids were at rates reasonable comparable to rates charged to eligible schools and libraries in urban areas for Instructions for Completing FCC Form 481 OMB Control No. 3060-0986 (High-Cost) OMB Control No. 3060-0819 (Low-Income) November 2020 Page 44 comparable offerings. This filing is required by 47 C.F.R. Section 54.313(e)(2)(i)(C). This certification will not be required until the July 1st following the E-Rate program year that this obligation has been fully implemented. Modernizing the E-Rate Program for Schools and Libraries et al., WC Docket. Nos. 13-184, 10-90, 29 FCC Rcd 15538, 15566-67, para. 72 (2014).

☐

Yes

☐

No

☐

Not Applicable

Post-Final Deployment Milestone Performance Certification (10014)

Starting the first July 1st after a Rural Digital Opportunity Fund recipient meets its final service milestone until the July 1st after the support recipient's support term has ended, please provide a response (either yes, no, or not applicable) that the Rural Digital Opportunity Fund-funded network that the support recipient operated in the prior year meets the relevant performance requirements in 47 C.F.R. Section 54.309. This filing is required by 47 C.F.R. Section 54.313(e)(2)(iii).

☐

Yes

☐

No

☐

Not Applicable

Viasat

FCC Form 481

State: UT

OMB Control #: 3060-0986 (High Cost) &

Sac: 509022

3060-0819 (Low Income), December 2020

498 ID: 143051764

Program Year: 2025

Supply Chain Certifications

Section 54.9: Prohibition on the Use of Funds

I certify under penalty of perjury that no universal service support has been or will be used to purchase, obtain, maintain, improve, or otherwise support any equipment or services produced or provided by any company designated by the Federal Communications Commission as posing a national security threat to the integrity of communications networks or the communications supply chain since the effective date of the designations.

If **No** is selected, a waiver is required for each SAC which is not certified.

☒ Yes ☐ No

Upload Waiver Document

PDF only

Section 54.10: Prohibition on the Use of Certain Federal Subsidies

I certify that no federal subsidy made available through a program administered by the Commission that provides funds to be used for the capital expenditures necessary for the provision of advanced communications services has been or will be used to purchase, rent, lease, or otherwise obtain, any covered communications equipment or service, or maintain any covered communications equipment or service previously purchased, rented, leased, otherwise obtained, as required by 47 C.F.R. Section 54.10.

If **No** is selected, a waiver is required for each SAC which is not certified.

☒ Yes ☐ No

Upload Waiver Document

PDF only

Section 54.11: Requirements to Remove and Replace

Prior to answering, review section 54.11 of the Commission's rules (47 CFR Section 54.11). Answer Yes if either (1) you comply with section 54.11(a), meaning you do not use covered communications equipment or services, or (2) section

Viasat

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comply with section 54.11(a), meaning you do not use covered communications equipment or services, or (2) section 54.11(d) applies to you, meaning you are not yet subject to section 54.11(a) because you are a Reimbursement Program recipient with an unexpired removal, replacement, and disposal term per section 1.50004(h) of the Commission's rules (47 CFR Section 1.50004(h)). Answer No if you do not comply with section 54.11(a), meaning you do use covered communications equipment or services.



Yes



No

Accuracy Certifications

Certify



I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.



I understand that making willful false statements in any part of this report and/or in these certifications is punishable by fine or imprisonment pursuant to 47 U.S.C. Sections 416(c), 503(b)(1)(B), and 18 U.S.C. Section 1001.

Signature

Officer Name

Robert Blair

Title

President and Secretary



I understand this is a digital signature, and is the same as if I signed my name with a pen.

(610) Descriptive document for Functionality in Emergency Situations

Viasat has in place contingency plans for credible emergency situations for each of the major network facilities that are geographically distributed across the United States. These plans contain activation, required staffing, escalation, and communication procedures to deal with such emergencies.

Additionally, all of the company's ground-based facilities are equipped with independent power generators and sufficient fuel to operate for several days so as to mitigate power outages. The design of these facilities contains multiple levels of redundancy and autonomy that also mitigate the need for dedicated human interaction.

(920) Tribal Government Engagement Obligation

Viasat Carrier Services, Inc. (“Viasat”) is committed to engaging directly and substantively with Tribal governments regarding its planned offering of services supported through the Connect America Fund (“CAF”) program on Tribal lands. Viasat is keenly aware of the difficulties faced by Tribal communities in accessing robust broadband and voice services. As the Commission correctly noted in its latest *Broadband Deployment Report*, “[t]he remote, isolated nature of these areas, combined with challenging terrain and lower incomes, increase the cost of network deployment and entry” on Tribal lands, particularly for terrestrial technologies.¹ As a result of these challenges, that *Report* found that only “79% of Tribal lands are covered by fixed terrestrial 25/3 Mbps services and mobile 4G LTE with a speed of 5/1 Mbps.”²

As a provider of satellite broadband services—which are well suited for areas where terrestrial deployments may be cost-prohibitive—Viasat recognizes and embraces its responsibility to promote improved connectivity for Tribal populations. And as a recipient of federal support through the CAF Phase II auction, Viasat is particularly cognizant of its Tribal engagement obligations under Section 54.313(a)(5) of the Commission’s rules in connection with its planned offering of CAF-supported services on covered Tribal lands.³ That rule requires that the scope of a CAF recipient’s engagement with relevant Tribal governments encompass: (i) a needs assessment and deployment planning with a focus on Tribal community anchor institutions; (ii) feasibility and sustainability planning; (iii) marketing services in a culturally sensitive manner; (iv) rights of way processes, land use permitting, facilities siting, environmental and cultural preservation review processes; and (v) compliance with Tribal business and licensing requirements.⁴

Viasat has developed and is implementing a comprehensive strategy to engage with Tribal leaders across all these topic areas, in a manner designed to foster dialogue, tailor its services and marketing efforts appropriately, and promote partnering and employment opportunities as Viasat prepares to launch CAF-supported services in the relevant Tribal areas. These and other engagement initiatives are central to Viasat’s “Tribal Connect” program, established in part to ensure compliance with Viasat’s CAF obligations. Viasat also has a senior individual designated to help spearhead these initiatives, further promote these important programs, expand Tribal outreach, and enhance the Tribal Connect program to bring heightened awareness of service options to Tribal communities. Below is an overview of Viasat’s Tribal engagement efforts and planned initiatives with respect to the five areas specified in Section 54.313(a)(5).

¹ *Inquiry Concerning Deployment of Advanced Telecommunications Capability to All Americans in a Reasonable and Timely Fashion*, Fourteenth Broadband Deployment Report, 36 FCC Rcd 836 ¶ 20 (2021).

² *Id.* ¶ 43.

³ 47 C.F.R. § 54.313(a)(5).

⁴ *See id.*

Needs Assessment and Deployment Planning. As the Commission is aware, Viasat, Inc.'s satellite infrastructure already provides nationwide coverage—including in areas deemed 'unserved' by the Commission. As such, Viasat has not engaged in CAF-specific infrastructure deployment to the extent of other operators. Nevertheless, soon after the CAF Phase II auction, during the period in which Viasat was preparing its initial eligible telecommunications carrier ("ETC") applications, Viasat began developing a comprehensive contact list for Tribal authorities on all of the Tribal lands included within census blocks awarded to Viasat in the auction. Using that list, Viasat reached out to Tribal authorities in an effort to establish a dialogue regarding its planned deployment of CAF-supported services. As the Commission is aware, Viasat had extensive communications with the Office of Native Affairs and Policy and with Tribal leaders in Oregon regarding Viasat's desire to work together to bring Viasat's CAF-supported services to those areas. Further, now that Viasat has launched CAF-supported services in all twenty of the states in which it was awarded CAF funding, Viasat has expanded its efforts to reach out to individual Tribal governments in applicable areas and continues to attempt to establish a dialogue and to discuss how, when, and where Viasat is launching and expanding those services with each milestone. This includes efforts to determine specific Tribal service needs, the locations of anchor institutions such as schools, libraries, and hospitals on Tribal lands, Viasat's proposals for the various initiatives described herein, and its hopes for future collaboration. For example, Viasat presented to several different tribal leaders regarding its CAF program, and the Tribal Connect program in general, at the 2023 NTTA Tribal Broadband Summit, where Viasat sponsored its own table.

Feasibility and Sustainability Planning. Satellite broadband operators have obvious advantages over terrestrial operators in deploying services to remote Tribal areas in a feasible and sustainable manner, and Viasat is confident in its ability to make CAF-supported services available efficiently and cost-effectively in these areas. Viasat's Tribal engagement initiatives on this front therefore focus on promoting adoption—including by educating Tribal authorities about the availability and benefits of its planned offerings and by seeking to integrate members of Tribal communities as partners in the rollout of these services. For example, Viasat expanded upon its prior relationship with a third-party expert, Sovereign Resiliency Partners, with which it previously crafted an online seminar dedicated to educating Tribal leaders and communities regarding Viasat's communication services and the available opportunities to partner. It used the connections gained through that relationship to further establish dialog, including at the ITCA Tribal Leaders Meeting, through meetings with individual tribal leaders and members of tribal communities, as well as with those working on tribal lands to better connectivity. For example, Viasat held meetings and engaged with individuals like Joe Valandra and Scott Dinsmore, CEO and President and VP External Affairs, respectively, of Tribal Ready, and Tico Charlee of the Navajo Nation, as well as with the Colville Reservation and the Confederated Tribe of Siletz Indians. Viasat also continues to improve its Tribal-specific online materials for Tribal leaders and community members who seek information and resources about Viasat's planned offerings. Viasat will continue to use these methods as a platform for seeking input from Tribal leaders and communities regarding the best ways to offer service on Tribal lands in a manner that maximizes feasibility and sustainability. Furthermore, Viasat has implemented a program that it hopes will win the support and assistance of Tribal leaders, to partner with individual Tribal communities on educating and training community members as technicians and installers of Viasat equipment, thus creating employment opportunities directly within the communities, and encouraging even closer collaboration between the Tribal communities and Viasat.

Marketing Services in a Culturally Sensitive Manner. Viasat, Inc., Viasat's parent company, has offered services to Tribal populations across the country for many years, and is attuned to the need to ensure that services are marketed in a manner that will resonate with Tribal communities and stimulate adoption. Drawing from this experience, Viasat has developed

custom marketing and informational content dedicated to Tribal areas regarding its planned CAF-supported services. These efforts have included leveraging the aforementioned online seminars and conversations with tribal leaders and members as both an educational tool and a platform for feedback and communication about marketing efforts, in addition to targeted direct, digital, and out-of-home marketing options. For example, Viasat sends direct mail to known addresses within its launched tribal areas, and it uses digital display advertising such as targeted advertisements based on the geographic location of Tribal areas to which it has launched. Further, it uses location-based paid search ads on Google for searchers in geographic locations of Tribal areas based on keywords such as “CAF,” “Connect America,” “Lifeline,” “Linkup,” etc. Viasat also continues to explore the efficacy of available outdoor advertising units in high- traffic zones within Tribal areas to build awareness of CAF-supported services. Viasat’s direct outreach efforts to Tribal leaders continue to be intended to explore these options and refine them as Viasat receives feedback and suggestions.

Rights of Way and Other Permitting and Review Processes. Due to the nature of its satellite network, Viasat typically does not need to obtain access to rights-of-way in local communities in order to deliver communications services to end users in those communities, and the placement of small satellite antennas at end-user locations also does not typically trigger other permitting or review processes. That said, to the extent that any Tribal authority identifies any permitting or review processes relevant to the deployment of satellite services in the course of further engagement with Viasat, Viasat will of course abide by such processes as it makes CAF-supported offerings available on Tribal lands.

Compliance with Tribal Business and Licensing Requirements. During Viasat’s initial ETC application process, Viasat’s attempts at outreach to Tribal representatives included efforts to obtain information about any specific business licenses, certificates of authority, or other Tribal requirements necessary to conduct business on Tribal lands. For any Tribes that responded with any such requirements, Viasat promptly initiated the licensing processes. Viasat’s further initiatives to reach out to Tribal leaders as it expands the footprint of its CAF-supported services continue to include efforts to ascertain whether any additional Tribal business and licensing obligations exist in the relevant areas.

(1010) Detailed Description for Voice Services Rate Comparability Compliance

Viasat began providing the supported services to select census blocks in Utah on December 15, 2022 and then expanded its service area on November 29, 2023. Viasat complied with all Commission requirements, including, but not limited to, ensuring that its voice service rates were no more than two standard deviations above the applicable national average urban rate. For 2023, Viasat's Voice Service was priced at \$58.99 per month for stand-alone service, and at \$35.00 per month when purchased with its Broadband Service.

(1030) Detailed Description for Broadband Service Rate Comparability Compliance

Viasat began providing the supported services to select census blocks in Utah on December 15, 2022, and then expanded its service area on November 29, 2023.. Viasat complied with all Commission requirements, including, but not limited to, ensuring that its broadband service rates were consistent with the FCC's urban rate benchmarks for broadband service. For 2023, Viasat's Broadband Service was priced at \$89.99 per month and came with 600GB of data.