

**VIA EMAIL**

June 27, 2025

Gary Widerburg  
Commission Administrator  
Utah Public Service Commission  
Heber M. Wells Building  
160 East 300 South  
Salt Lake City, UT 84114

**RE: Docket No. 25-999-12 ViaSat Carrier Services, Inc. FCC 2025 Form 481 High-Cost Recertification Request for Action and Officer Attestation Filing SAC 509022**

Dear Mr. Widerburg:

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 2025 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 2026 funding.

Please do not hesitate to contact the undersigned directly with any questions about this report at [mpd@commlawgroup.com](mailto:mpd@commlawgroup.com).

Respectfully Submitted,



Michael Donahue

*Counsel for 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 (2024) 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 (2026) only for the provision, maintenance, and upgrading of facilities and services for which it is intended.

FURTHER AFFIANT SAYETH NOT.



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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<sup>th</sup> day of June, 2025.

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



Manetta Fenton

Signature of Notary Public

# ACTION REQUEST

Date: June 27, 2025

FROM: Public Service Commission

Due: September 1, 2025\*

SUBJECT: Viasat Carrier Services, Inc. – Annual ETC Recertification, Request  
Docket No. 18-2610-01  
(Company Name, Case Number, etc.)

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 2026.

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:

- ☒ 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
- ☒ 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.

## 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)

Shelby Striegel

#### Phone #(035)

(720)493-6150

#### Contact Email Address (039)

shelby.striegel@viasat.com

## 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)

509022 UT 610 Functionality.pdf

PDF only

Viasat  
State:UT  
SAC:509022  
498 ID:143051764

FCC Form 481  
OMB Control #: 3060-0986 (High Cost) &  
3060-0819 (Low Income), December 2020  
Program Year:2026

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## Operating Companies (800)

### Carrier Names

#### Reporting Carrier (810)

Viasat Carrier Services, Inc.

#### 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)

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

### Operating Company

#### Operating Company (812)

Viasat Carrier Services, Inc.

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

[Operating Company Data Template](#)

CSV only

Viasat  
State:UT  
SAC:509022  
498 ID:143051764

FCC Form 481  
OMB Control #: 3060-0986 (High Cost) &  
3060-0819 (Low Income), December 2020  
Program Year:2026

## 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)

Paiute Indian Tribe of Utah  
Ute Mountain Ute Tribe  
Navajo Nation

Tribal Government Engagement Obligation (920)

509022 UT 920 Tribal Engagement.pdf

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



Viasat  
State:UT  
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FCC Form 481

OMB Control #: 3060-0986 (High Cost) &  
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Program Year:2026

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**Compliance with Rights of way processes (924)**

Yes	No	NA
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**Compliance with Land Use permitting requirements (925)**

Yes	No	NA
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**Compliance with Facilities Siting rules (926)**

Yes	No	NA
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**Compliance with Environmental Review processes (927)**

Yes	No	NA
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**Compliance with Cultural Preservation review processes (928)**

Yes	No	NA
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**Compliance with Tribal Business and Licensing requirements (929)**

Yes	No	NA
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## 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)

509022 UT 1010 Voice Service.pdf

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.

#### Attach Detailed Description for Broadband Rate Comparability Compliance (1030)

509022 UT 1030 Broadband.pdf

PDF, XLS, XLSX only

## Terrestrial Backhaul Reporting (1100)

### Certify

#### Terrestrial Backhaul Certification (1100)

Do terrestrial backhaul options exist?

Yes

No

Viasat  
State:UT  
SAC:509022  
498 ID:143051764

FCC Form 481  
OMB Control #: 3060-0986 (High Cost) &  
3060-0819 (Low Income), December 2020  
Program Year:2026

## Phase II Auction Reporting (6005)

### Certify

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

34177.00

### Phase II Auction and 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

FCC Form 481

State:UT

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

SAC:509022

3060-0819 (Low Income), December 2020

498 ID:143051764

Program Year:2026

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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

## Certifications

### 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

#### 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

#### 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 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

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## 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

Received Date

2025-06-23

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

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.<sup>1</sup> 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.<sup>2</sup>

Viasat has developed and continues to implement 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 launches and continues to provide 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, as well as a working group, 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).

**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, 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 and 2025 NTTA Tribal Broadband Summits, where Viasat was a sponsor.

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<sup>1</sup> 47 C.F.R. § 54.313(a)(5).

<sup>2</sup> See *id.*

**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. Viasat has made its CAF-supported services available throughout its launched tribal areas and is confident in its ability to make services available efficiently and cost-effectively in the remaining 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 offerings and by seeking to integrate members of Tribal communities as partners in the continued rollout of these services. Viasat has continued its efforts to further establish tribal dialog, through email communications and other contacts with members of tribal communities, as well as with those working on tribal lands to better connectivity. Viasat also continues to improve its Tribal-specific online materials for Tribal leaders and community members who seek information and resources about Viasat's currently available and 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 continued to offer 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 information gained from 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 strives to make the CAF-supported services even more affordable in tribal areas by offering additional tribal lands-specific discounts that it promotes to tribal leaders to encourage tribal residents to contact Viasat. Viasat instituted a specific call flow to identify when tribal residents contact Viasat, which it uses to offer the additional tribal lands-specific discount. Viasat's direct outreach efforts to Tribal leaders continue to explore the success of these efforts 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 has continued to reach out to Tribal leaders as it expands the footprint of its CAF-supported services to maintain its 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 December 15, 2022, and then expanded its service area on November 29, 2023 and November 18, 2024. 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 2024, Viasat's Voice Service was priced at \$54.99 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 on December 15, 2022, and then expanded its service area on November 29, 2023 and on November 18, 2024. 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 2024, Viasat's Broadband Service was priced at \$88.99 per month and came with 660GB of data.