

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of) Docket No. _____
)
Petition of Viasat Carrier Services, Inc.)
for Designation as an Eligible Telecommunications)
Carrier to Receive Connect America Fund Phase II)
Auction (Auction 903) Support for Voice and)
Broadband Services)

**PETITION OF VIASAT CARRIER SERVICES, INC. FOR LIMITED DESIGNATION AS AN
ELIGIBLE TELECOMMUNICATIONS CARRIER TO RECEIVE CONNECT AMERICA FUND
PHASE II AUCTION (AUCTION 903) SUPPORT FOR VOICE AND BROADBAND SERVICES
AND
REQUEST FOR EXPEDITED CONSIDERATION**

Viasat Carrier Services, Inc. (“Viasat” or the “Company”) respectfully submits this Petition for designation as an Eligible Telecommunications Carrier (“ETC”) to the Public Service Commission of Utah (“Commission”) pursuant to section 214(e)(2) of the Communications Act of 1934, as amended (the “Act”),¹ and Sections 54.201 and 54.202² of the rules and regulations of the Federal Communications Commission (“FCC”). Viasat’s parent company, Viasat, Inc. (“VSI”), was selected as a winning bidder in Utah³ under the FCC’s Connect America Fund Phase II Auction (Auction 903) (the “CAF II Auction”).⁴ However, Viasat’s receipt of CAF II Auction funding is conditioned upon Viasat obtaining designation as an ETC in the eligible Census Blocks by February 25, 2019.⁵ Accordingly, Viasat seeks designation only in the Census Blocks for which it was awarded funding

¹ 47 U.S.C. § 214(e)(2).

² 47 C.F.R §§ 54.201 and 54.202.

³ *Connect America Fund Phase II Auction (Auction 903) Closes Winning Bidder Announced FCC Form 683 Due October 15, 2018*, AU Docket No. 17-182, WC Docket No. 10-90, Public Notice, DA 18-887, (rel. Aug. 28, 2018) (“*Auction 903 Results Notice*”), Attachment A at 10; see also https://auctiondata.fcc.gov/public/projects/auction903/reports/all_assigned_census_blocks (listing winning bidders).

⁴ *See Connect America Fund Phase II Auction Scheduled for July 24, 2018; Notice and Filing Requirements and Other Procedures for Auction 903*, Public Notice, FCC 18-6, 33 FCC Rcd 1428 (2018) (“*Auction 903 Procedures Public Notice*”).

⁵ *Auction 903 Results Notice*, para. 15, n. 11 (“By February 25, 2019, the long-form applicant must obtain from all the relevant states or the Commission a high-cost ETC designation(s) that cover its winning bid areas and upload the required documentation and a certification letter to its FCC Form 683.”).

from the CAF II Auction, as identified in **Exhibit A**.

Section 214(e)(2) of the Act authorizes the Commission to designate a company that meets the requirements of 47 U.S.C. § 214(e)(1), such as Viasat, as an ETC. As demonstrated in this Petition, Viasat meets all requirements for ETC designation, and, as shown by the description herein of Viasat's planned voice and broadband deployment projects, designating Viasat as an ETC in the proposed areas would advance the goals of universal service and is in the public interest.

In the alternative, if the Commission will not exercise jurisdiction to review this Petition, Viasat requests an affirmative statement that it should seek ETC designation from the FCC. The FCC has provided that petitioners seeking an FCC ETC designation to serve non-Tribal lands must submit "an affirmative statement from the state commission or a court of competent jurisdiction that the carrier is not subject to the state commission's jurisdiction."⁶ The statement may take the form of a "duly authorized letter, comment, or order, from the relevant state regulatory commission or a court of competent jurisdiction, indicating that the state lacks authority to designate the carrier."⁷

In support of this Petition, Viasat states as follows:

I. BACKGROUND

Viasat is a Delaware corporation headquartered at 6155 El Camino Real, Carlsbad, California 92009. Viasat has submitted an application with the Utah Secretary of State to do business in Utah as a foreign corporation.⁸ Viasat is a wholly-owned subsidiary of VSI, a Delaware corporation also headquartered at 6155 El Camino Real, Carlsbad, California 92009. Viasat will outsource technical, billing, installation, and customer service matters to VSI as doing so is more efficient and cost-effective than creating duplicative functions. Viasat will also rely on the significant managerial and technical

⁶ Phase II Auction Order, 31 FCC Rcd at 6004, para. 154 (quoting 2000 Tribal Order, 15 FCC Rcd at 12214, para. 7).

⁷ 2000 Tribal Order, 15 FCC Rcd at 12264, para. 113.

⁸ Viasat will supplement this Petition when the Secretary of State issues Viasat a certificate of authority to do business as a foreign corporation.

expertise of VSI.

VSI is an innovator in broadband technologies and services. VSI's end-to-end platform of high-capacity Ka-band satellites, ground infrastructure and user terminals enables VSI to provide cost-effective, high-speed, high-quality broadband solutions to enterprises, consumers and government users around the globe. In addition, VSI develops and provides advanced wireless communications systems, secure networking systems and cybersecurity and information assurance products and services. VSI's satellite networks support broadband Internet access, video streaming, and voice over IP ("VoIP"), among other applications. VSI provides broadband and VoIP services to customers in all fifty states and the District of Columbia. VSI has previously deployed several consumer broadband networks, starting with the WildBlue-1 network, which was deployed in 2005 and has operated continuously since that time. In 2011, VSI deployed the ViaSat-1 satellite network, which VSI has used to provide high-speed, high-quality broadband services to consumers and other end users. In 2017, VSI deployed the ViaSat-2 satellite network, which commenced service in April 2018. In addition, VSI has a new satellite under construction and ready for launch in the 2020 timeframe, ViaSat-3, which will allow Viasat to offer even higher speeds of broadband service and more capacity than ViaSat-2.

VSI's satellite networks utilize geostationary-satellite orbit ("GSO") satellite technologies. Last-mile connectivity is provided to end users through GSO user terminals that communicate directly with VSI's satellites. VSI's satellites also connect to satellite access nodes ("SANs") that are located on the ground and interconnect with the Internet, public switched telephone network ("PSTN"), and other terrestrial networks using leased fiber.

II. COMMUNICATIONS AND CORRESPONDENCE

Pleadings, orders, notices, or other correspondence and communications regarding this Petition should be provided to:

Jason Sophinos
Associate General Counsel
ViaSat, Inc.
349 Inverness Drive South

Englewood, CO 80112, USA
Tel: 720-493-6365
Email: Jason.Sophinos@viasat.com

With a courtesy copy to:

Michael P. Donahue
Alex Schneider
Marashlian & Donahue, PLLC
1420 Spring Hill Road, Suite 401
Tysons, VA 22102
Tel: 703-714-1319
Fax: 703-563-6222
E-Mail: mpd@CommLawGroup.com
ais@CommLawGroup.com

III. VIASAT'S PROPOSED PARTICIPATION IN THE FCC'S CAF II AUCTION

A. Background on the CAF II Auction

On January 31, 2018, the FCC issued an Order on Reconsideration concerning its Connect America Fund initiative, which enabled the FCC to move forward with the CAF II Auction, in which service providers competed to receive up to \$1.98 billion to offer voice and broadband service in unserved high-cost areas.⁹ That Order followed a series of orders establishing the details of the CAF II Auction.¹⁰ Under this program the FCC will disburse up to \$198 million annually for providers—including competitive providers such as competitive local exchange carriers, cable operators, fixed wireless ISPs, satellite broadband, or alternative providers such as electric utilities and governmental entities—to deploy broadband networks in high-cost, unserved price cap areas.

B. Viasat's Selection as a Winning Bidder

The FCC's August 28, 2018 *Auction 903 Results Notice* announced that VSI was among the winners of the recently-concluded CAF II Auction.¹¹ Specifically, the FCC designated VSI as a winning

⁹ *Connect America Fund, et al.*, Order on Reconsideration, 33 FCC Rcd 1380 (2018).

¹⁰ *See, e.g., Connect America Fund et al.*, Report and Order and Further Notice of Proposed Rulemaking, 31 FCC Rcd 5949 (2016) ("*Phase II Auction Order*"); *Connect America Fund, et al.*, Report and Order and Order on Reconsideration, 32 FCC Rcd 1624 (2017) ("*Phase II Auction FNPRM Order*"); *Connect America Fund et al.*, Report and Order and Further Notice of Proposed Rulemaking, 26 FCC Rcd 17663 (2011) ("*USF/ICC Transformation Order*").

¹¹ *Auction 903 Results Notice*, Attachment A at 10.

bidder in 65 Census Block Groups covering Utah. *See* Exhibit A. In accordance with the FCC's procedures,¹² VSI assigned its winning bid to Viasat. In order for Viasat to receive the CAF II Auction support that it has been awarded, it must demonstrate to the FCC that it has been designated as an ETC in the areas where it was the winning bidder. The FCC's deadline for submitting proof of the ETC designation is February 25, 2019.¹³

C. Need for Expedited ETC Designation

The FCC did not require that CAF II Auction participants be designated ETCs at the time they filed their applications. However, winning bidders must, within 180 days of being announced as winning bidders, obtain ETC designation in any areas for which they are awarded support and submit appropriate documentation of such ETC status to the FCC.¹⁴ As noted, Viasat has been selected as a winning bidder in the CAF II Auction for 65 Census Block Groups in Utah. Because the timeframe for Viasat to obtain ETC designation is short and the consequences of failure to do so are severe, Viasat respectfully requests that the Commission review this Petition promptly and grant Viasat ETC designation in the Census Blocks identified in this Petition on an expedited basis.

IV. VIASAT AND ITS TECHNICAL QUALIFICATIONS

A. ViaSat's Expertise and Experience

Viasat's parent company, VSI, is a leading provider of communications solutions across a wide variety of technologies (both terrestrial and satellite), and has played a significant role in expanding the availability of broadband services across the country. Among other things, VSI has revolutionized the satellite industry by reducing the "cost per bit" of delivering broadband service. As a result, VSI

¹² *See Auction 903 Procedures Public Notice*, para. 37.

¹³ *Auction 903 Results Notice*, para. 15, n. 11 ("By February 25, 2019, the long-form applicant must obtain from all the relevant states or the Commission a high-cost ETC designation(s) that cover its winning bid areas and upload the required documentation and a certification letter to its FCC Form 683.").

¹⁴ *See* 47 CFR §§ 54.310(e)(1), 54.315(b)(5); *see also Auction 903 Procedures Public Notice*, 33 FCC Rcd 1428, 1473 ("the [FCC] decided that an applicant need not be an ETC as of the initial short-form application filing deadline for Auction 903, but that it must obtain a high-cost ETC designation for the areas covered by its winning bids within 180 days after being announced as a winning bidder"); *Auction 903 Results Notice*, DA 18-887, para. 34.

now provides high-quality broadband service to end users, and affords millions of Americans—including in rural and “high-cost” areas—an effective competitive alternative to wired and wireless terrestrial services, which rely on infrastructure that is often less cost-effective.

Viasat is qualified to meet applicable CAF II obligations given VSI’s proven track record of technical and commercial success operating as a provider of satellite broadband services and associated equipment. VSI’s technical qualifications have been reviewed by the FCC on numerous occasions, and the favorable results of such reviews are reflected in the multiple FCC licenses and authorizations granted to the company. VSI also holds a number of patents with respect to satellite technology, which cover, among other things, user terminals and networking and demonstrate the company’s commitment to the development of innovative network solutions. Viasat is proud to have at its disposal VSI’s extensive staff of experienced engineers with expertise in the fields of communications technology, hardware design, software development, data analytics, and networking. This expertise made it possible for Viasat to confidently participate in the CAF II auction with the certainty that the company will be able to fulfill its obligations.

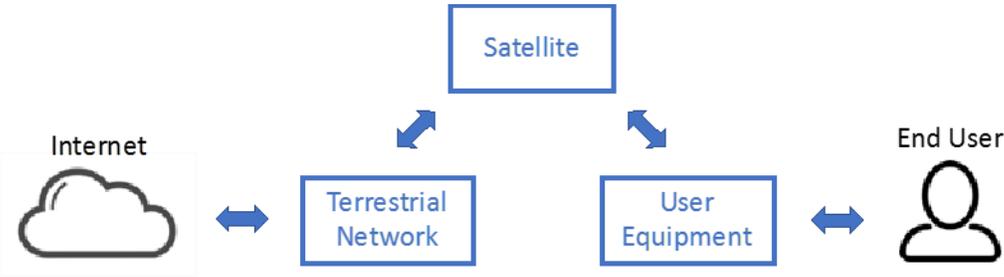
Today, VSI serves customers in all fifty states, as well as the District of Columbia. These customers include almost 600,000 residential customers. In addition, VSI connects millions of personal electronic devices per month on aircraft that rely on satellite broadband for connectivity to the Internet. VSI also has extensive experience managing the technical and customer service-related issues associated with the provision of consumer broadband services. Notably, VSI monitors network performance on a 24/7 basis and has implemented procedures to leverage its extensive engineering resources quickly and effectively.

B. Viasat’s Network Architecture

VSI will use GSO network architectures and technologies to provide CAF II-supported services. The same supported services will be provided in all supported areas. As such, the network description provided herein to each state in which supported service will be provided.

VSI currently provides GSO services using the ViaSat-1 and ViaSat-2 networks. VSI has also been authorized to provide service to the United States using two additional GSO networks at the 79° W.L. and 88.9° W.L. orbital locations. The ability to operate satellites at either or both of those locations, along with associated ground equipment, will allow Viasat to scale available capacity over time in order to accommodate the demand for CAF II- supported services.

Each of Viasat’s satellite networks is comprised of three principal segments: (i) a space segment consisting of communications links between Viasat’s satellites and associated ground facilities (which in turn connect to Viasat’s terrestrial network); (ii) a terrestrial network consisting of terrestrial data, management and control functions, and interconnection to the Internet; and (iii) a user segment, consisting of links between Viasat’s satellites and the end user equipment.



1. Space Segment

The space segment consists of the communication links between VSI’s GSO satellites located in space and gateway earth stations or SANs located on the ground. As noted above, VSI currently provides consumer broadband service over two GSO satellites—ViaSat-1 and ViaSat-2. Together, these satellites will allow Viasat to provide service to all supported areas. These satellites utilize Ka-band spectrum, and will provide capacity to facilitate the provision of supported services.

- **ViaSat-1** is a “bent-pipe” Ka-band satellite, which uses relatively small “spot beams” that allow the efficient reuse of available spectrum resources. ViaSat-1 provides at least 140 Gbit/s of total capacity. ViaSat-1 currently communicates with 17 gateway earth stations. In addition to an antenna and associated radiofrequency (“RF”) and baseband equipment, each gateway contains a fiber link back to a core node, where

data is further processed before connecting to the internet (as part of the terrestrial network segment, described below).

- **ViaSat-2** is a newer satellite design than ViaSat-1. ViaSat-2 has a maximum potential capacity of approximately 260 Gbit/s. ViaSat-2 has a unique design which allows ViaSat to allocate capacity among spot beams based on demand. ViaSat-2 currently communicates with 46 SANs. SANs are similar to gateway earth stations, except that in the case of SANs certain equipment (and related functions) are essentially relocated to the core node to increase operational efficiency.

As noted above, VSI has been authorized to provide service to the United States using two additional GSO networks at the 79° W.L. and 88.9° W.L. orbital locations. Satellites operating at these locations will allow Viasat to scale available capacity over time to accommodate additional subscribers.

2. Terrestrial Network

The terrestrial network segment performs the transport, data processing, control, and management functions for VSI's GSO networks. The terrestrial network segment is physically implemented using core nodes, fiber optic transport links, and public cloud computing centers.

- The **transport network** physically connects each gateway and SAN with its associated core node, and also connects the core nodes together to provide redundant data paths. The transport network is based on leased fiber wavelengths terminated into commercial off-the-shelf ("COTS") switching and routing equipment.
- Viasat maintains several **core nodes** across the country, which: (i) serve as aggregation points for data traffic routed through gateways and SANs; and (ii) interconnect with the Internet, the PSTN, and other terrestrial networks through leased fiber. The core nodes essentially operate as private data centers and use a combination of proprietary and COTS applications.

- Control and management functions (*e.g.*, provisioning, accounting, billing, network monitoring, and configuration management) are hosted in the *public cloud*. These functions utilize a combination of proprietary software and customized COTS software products. Hosting these functions in the public cloud allows them to be highly available and easily expandable.

3. **User Segment**

The user segment refers to the portion of the network that connects each individual user to one or more of VSI's GSO satellites and, therefore, the larger satellite network. It is the rough analog of the "last mile" in terrestrial wireline networks. Relevant equipment (other than the satellite itself) includes the following:

- The **user terminal** is the ground-based equipment employed by an individual user to access the Viasat satellite network. The user terminal consists of an indoor unit (IDU), outdoor unit (ODU), inter-facility link (IFL), and power supply (which are depicted in the figure below).

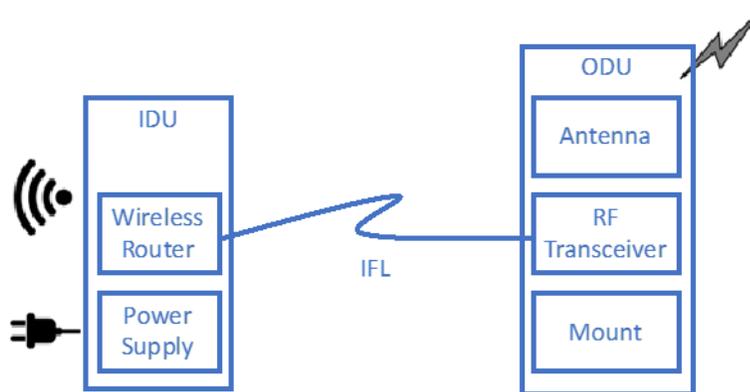


Figure: Viasat User Terminals

- The **indoor unit (or IDU)** performs client-side functions related to Internet access (*e.g.*, those related to use of transmission control protocol (TCP) and hypertext transfer protocol (HTTP)), as well as certain signal conversion, modulation, and amplification functions. The IDU also incorporates a WiFi router that can be accessed

by end users (and their communications devices) in the same manner as other WiFi routers. The IDU interfaces with the ODU through the inter-facility link (described below).

- The ***outdoor unit (or ODU)*** performs certain signal conversion, modulation, and amplification functions, and transmits signals to and receives signals from the satellite. The ODU is typically mounted on a roof or a pole and interfaces with the IDU through the inter-facility link (described below).
- The ***inter-facility link (or IFL)*** is a 75 Ohm coaxial cable that carries the communications signal and electrical power between the IDU and ODU.

V. VIASAT MEETS THE STATE AND FEDERAL STATUTORY AND REGULATORY REQUIREMENTS FOR ETC DESIGNATION

Viasat meets all applicable requirements for designation as an ETC, including 47 U.S.C. § 214(e) and 47 C.F.R. § 54.201, *et seq.*

A. Viasat Meets All Federal Requirements For ETC Designation

Viasat meets all criteria for designation as an ETC under federal law. Specifically:

1) For purposes of this designation, Viasat will provide service on a common carrier basis. Viasat currently provides broadband Internet access service and VoIP service. As to customers and locations where Viasat is awarded CAF II Auction support, Viasat will provide its voice service on a common carrier basis. As such, Viasat is a common carrier (47 U.S.C. § 214(e)(1); 47 C.F.R. § 54.201(d));

2) VSI is a facilities-based satellite provider with its own fleet of satellites, earth stations, gateways, switching facilities, and other associated facilities and, therefore, Viasat will offer the supported services using its own facilities or a combination of its own facilities and resale of another carrier's services (47 U.S.C. § 214(e)(1)(A); 47 C.F.R. § 54.201(d)(1)).

3) As required by 47 C.F.R. § 54.101, Viasat will offer the voice telephony and broadband services supported by federal universal service support mechanisms, including the following

capabilities:

Voice Grade Access To The Public Switched Telephone Network – Viasat meets this requirement through its provision of an interconnected VoIP service that includes minutes of use for local service provided at no charge to end users (*i.e.*, plans are generally unlimited usage within the U.S.) and access to emergency services via 911 or E-911, wherever available from local government or public safety organizations. Viasat will also provide toll limitation services to qualifying low-income consumers as provided in the Commission’s Rules (47 C.F.R. § 54.101(a)(1)).

Broadband Internet Access Services – Viasat’s broadband Internet access service provides the capability to transmit data to and receive data by wire or radio from all or substantially all Internet endpoints, including any capabilities that are incidental to and enable the operation of the communications service (47 C.F.R. § 54.101(a)(2)).

Viasat commits to provide these services consistent with applicable high-cost universal service support rules (47 C.F.R. § 54.101(c)). Viasat will also offer Lifeline service as required by the FCC’s rules at all locations where it has been awarded support (47 C.F.R. § 54.101(d));

4) Viasat will offer voice telephony as a standalone service and at rates that are reasonably comparable to urban rates;¹⁵

5) Viasat will advertise the availability of its universal service offerings and charges for such offerings using media of general distribution (47 U.S.C. § 214(e)(1)(B); 47 C.F.R. § 54.201(d)(2)), namely through a combination of digital and traditional media, such as the Internet, outbound Email, advertising via radio, newspapers, magazines or other print advertisements, outdoor advertising, or direct marketing, and will also publicize the availability of Lifeline service in a manner reasonably designed to reach those likely to qualify for the service (47 C.F.R. § 54.405(b));

6) Viasat will provide the supported services throughout the designated CAF II Auction

¹⁵ *USF/ICC Transformation Order*, 26 FCC Rcd at 17693, paras. 80-81; *see also* 47 C.F.R. § 54.101(b).

awarded service areas (47 U.S.C. § 214(e)(1); 47 C.F.R. § 54.201(d));

7) Viasat certifies that, in accordance with 47 U.S.C. § 254(e), it will use federal universal service support only for the provision, maintenance, and upgrading of facilities and services for which the support is intended.

8) Viasat further certifies that it meets all of the applicable requirements for designation as an ETC¹⁶ under 47 C.F.R. § 54.202 as follows:

Compliance With Applicable Service Requirements. Viasat certifies that it will comply with the service requirements applicable to the support that it receives,¹⁷ including the requirements of the CAF II Auction.

Ability to Remain Functional in Emergency Situations. VSI has been providing high speed internet service to customers on 24 hours x 365 days a year mode for more than thirteen years. As part of providing this commercial service, it is necessary to have 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 the 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. Viasat plans to apply this successful model to its CAF II Auction services and customers.

VI. DESIGNATION OF VIASAT AS AN ETC IS IN THE PUBLIC INTEREST

In the FCC's recent *Order on Reconsideration* concerning the Connect America Fund program,

¹⁶ The FCC waived the requirement for a winning bidder to file a five-year plan (47 C.F.R. § 54.202(a)(1)(ii)) and to demonstrate that it will satisfy applicable consumer protection and service quality standings (47 C.F.R. § 54.202(a)(3)). *WCB Reminds Connect America Fund Phase II Applicants of the Process for Obtaining Federal Designation as an Eligible Telecommunications Carrier*, WC Docket Nos. 09-197, 10-90, Public Notice, DA 18-714, at 4-5 (rel. July 10, 2018) ("FCC ETC Procedures Notice").

¹⁷ 47 C.F.R. § 54.202(a)(1)(i).

the FCC described holding the CAF II Auction as a step to “the goal of closing the digital divide for all Americans, including those in rural areas of our country.”¹⁸ As a winning bidder in the CAF II Auction, Viasat is eligible to receive approximately \$3.1 million in federal funding over the next ten years to bring high-quality, innovative voice and broadband services to consumers in underserved portions of Utah. By selecting Viasat as a recipient of CAF II Auction funds, the FCC has recognized that the voice and broadband services Viasat proposes to deploy with the funds would advance the goal of the CAF II Auction, and thereby advance the goals of universal service.

Granting Viasat’s Petition will serve the public interest through the deployment of broadband and voice services to unserved and underserved high-cost areas in Utah, support investment in facilities and equipment, and expand the number of competitive providers serving rural areas in Utah. Designating Viasat as an ETC will permit the company to receive CAF II Auction funds designated for Utah, directly advancing the goals of the FCC’s Connect America Fund and the Auction. Viasat’s resulting deployments will bring expanded voice and broadband connectivity to rural areas in Utah, helping to close the digital divide for residents of Utah, and expanding economic opportunity for communities that will benefit from increased connectivity. Designating Viasat as an ETC will also help promote economic and job growth in Utah through the employment of Viasat’s network of independent installers and dealers. Because granting Viasat’s Petition will allow it to use the CAF II funds as intended to expand voice and broadband service in Utah, designating Viasat as an ETC is in the public interest.

VII. CONCLUSION

For the reasons stated herein, Viasat respectfully requests that the Commission designate Viasat as an ETC in the areas identified in **Exhibit A** on an expedited basis and order such other relief as may be appropriate.

¹⁸ *Connect America Fund, et al.*, Order on Reconsideration, 33 FCC Rcd 1380, para. 1.

Respectfully submitted,

Viasat Carrier Services, Inc.

By: /s/ Robert Blair_____

Robert Blair
President
Viasat Carrier Services, Inc.
349 Inverness Drive South
Englewood, CO 80112

Dated: September 26, 2018.

Certificate of Service

I hereby certify that a true and correct copy of the foregoing was served by email this 26th day of September, 2018, upon the following:

DIVISION OF PUBLIC UTILITIES

Chris Parker chrisparker@utah.gov

Patricia Schmid pschmid@utah.gov

Justin Jetter jjetter@utah.gov

Bill Duncan wduncan@utah.gov

Casey Coleman ccoleman@utah.gov

OFFICE OF CONSUMER SERVICES

Michele Beck mbeck@utah.gov

Steven Snarr stevensnarr@utah.gov

Robert Moore rmoore@utah.gov

Cheryl Murray cmurray@uath.gov

/s/ Alex Schneider

LIST OF EXHIBITS

Exhibit A – List of Census Blocks Where Viasat Carrier Services, Inc. was Awarded CAF II Auction Support

EXHIBIT A

List of Census Blocks Where Viasat Carrier Services, Inc. was Awarded CAF II Auction Support

490379781001520 490572101001110 490572101001042 490059801001730 490190003002641
490279742001026 490419751001250 490211101001079 490039601003445 490251301002077
490572101001334 490379781001385 490419755002350 490059801001750 490419752001035
490279741001014 490419755002126 490572101001447 490059801001347 490279743001173
490230102002285 490279743002618 490379781001806 490059801001601 490039601002016
490532703004280 490279742002221 490532703004288 490379781001754 490490109002990
490379781001758 490279742003121 490211105002010 490519405001148 490399722001137
490211101004059 490490109002846 490379781001676 490439641011125 490379781001669
490279742003215 490439644012004 490419755002181 490379781001626 490039601002062
490439643062006 490419751004115 490279742001023 490379781001006 490059801001631
490379781001680 490059801001701 490439643061077 490379781001522 490039601001042
490490109001085 490490109002910 490039601003416 490039601001001 490379781001760
490379781001545 490572101001019 490059801001237 490419755002157 490211101004084
490279742003990 490039601002186 490379781001730 490572101001154 490532701001203
490211101004272 490279742003009 490419755002114 490419751001278 490572101001442
490279743002935 490279743001153 490379781001032 490532703004161 490379782001487
490490109002924 490379781001737 490419755002208 490419751001456 490190003003081
490419751001062 490279741001157 490379782001705 490230102003418 490059801001595
490279741001051 490490109002179 490211101004103 490279742002090 490419751001050
490190003003080 490439643061000 490419751001114 490190003003208 490419752001649
490451307031000 490379782001492 490279743002352 490532702001036 490011002001382
490451307031001 490190003002304 490059801001598 490419755002368 490230102003455
490572101001128 490379781001360 490419751001039 490230102002299 490490109002152
490451307031008 490419752001033 490379781001205 490419752001037 490279743001271
490439641011129 490211101004102 490011002001753 490572101001186 490039601001003
490379781001731 490572101001179 490572101001126 490419751001388 490572101001143
490279743001147 490490101131312 490532703004021 490011002001766 490439643061051
490059801001591 490439643061065 490279741001417 490519405001145 490532702001019
490451307033139 490059801001377 490532702001002 490279741001298 490230102003581
490379781001759 490230101002008 490039601001167 490279743003228 490059801001665
490379782001832 490059801001587 490211107021199 490039601001062 490190003003259
490379781001373 490490109002011 490379781001221 490039601001000 490379782001266
490059801001330 490399722001138 490039601003436 490572101001119 490572101001048
490279742003021 490419752001551 490532701003003 490451307033827 490059801001648
490439643061078 490572101001448 490419753001020 490572101001057 490379782001692
490039601003435 490490109001090 490439643031000 490419751001028 490039601003265
490532702002127 490451307033158 490379781001589 490190003003254 490211105002094
490230102003200 490190003003179 490419755002098 490230102002317 490379781001764
490419751001383 490419751004261 490279743001244 490230102002312 490279742001048
490279742003025 490379781001958 490490109001026 490559791002832 490532701003086
490279741001444 490419751001352 490039601001011 490419755002378 490279741001156
490439643061108 490230102003525 490279743002256 490279743002689 490572101001158
490039601001055 490451307031990 490059801001709 490351101032042 490439643061092
490279741001387 490190003003258 490559791002020 490379782001686 490490109001128
490572101001435 490379782002029 490490109002209 490279743003105 490059801001184
490379782001870 490572101001085 490059801001630 490230102002020 490059801001607
490190003003139 490230102002262 490251302004066 490039601002060 490279741001357
490039601001059 490451307033138 490419751001056 490572101001063 490059801001682
490211101001110 490379781001704 490419755002408 490190003003107 490379781001628
490351139061199 490419752002067 490532702001050 490190003002357 490230102003642
490279742002196 490572101001099 490419751004003 490572101001031 490419752001076
490419751001366 490419751001020 490379782001498 490039601003038 490279741001201
490059801001207 490059801001632 490572101001082 490279742003256 490059801001618

490379781001638 490379782001307 490190003003138 490439643061090 490379781001742
490490109001019 490419755002130 490279742002201 490379781001898 490059801001578
490211101004274 490279743002300 490039601003414 490039601001044 490059801001228
490419755002013 490532701001121 490572101001050 490190003003243 490572101001040
490279742003231 490490109002087 490011002001746 490230102003382 490532701001240
490572101001030 490572101001160 490211101004112 490419755002374 490230102003584
490419755002112 490230101002006 490230102002232 490439643061079 490059801001418
490490106002378 490379781001738 490190003003119 490559791002586 490419751001369
490379781001539 490419755002325 490279742002174 490059801001398 490211101004072
490439643061004 490532701003000 490532702002377 490190003003195 490419751001464
490039601003418 490279743001462 490251301002011 490379782001334 490279741001374
490059801001679 490279743002772 490572101001032 490059801001663 490011002001106
490379781001860 490451307031987 490279742003424 490490109002908 490532703004279
490451307031985 490039601001231 490059801001569 490059801001136 490379781001923
490059801001725 490439643061014 490532702001043 490490109002039 490379781002003
490279741001506 490439643061091 490532702001042 490439643061007 490419751001392
490419751001035 490419751001393 490230102003202 490451307031989 490490104111299
490490109002410 490230102003288 490039601001045 490230102003006 490490109002051
490039601002069 490279743002281 490559791002039 490230102002107 490379781001530
490379781001380 490490106002208 490419755002125 490059801001387 490379781001938
490439643061072 490572101001107 490419755002307 490011002001695 490572101001226
490039601001038 490190003003199 490059801001236 490532703004025 490490109001441
490419751001038 490190003002075 490379781001537 490419751004269 490532703004017
490419751001078 490230102002066 490419751001365 490419752001072 490379781001631
490230102003194 490279742002432 490379781001389 490532701001136 490419752001075
490059801001427 490230102003474 490059801001651 490211101001077 490419751001041
490279743001241 490379782001639 490059801001441 490572101001140 490559791002070
490279741001015 490451307031992 490379781001617 490279743001223 490419751001476
490419751001044 490039601001013 490059801001331 490059801001749 490532703004026
490419752001622 490011002001764 490572101001121 490190003003134 490011002001928
490059801001752 490279743001456 490451307033006 490379781001826 490532703004169
490230102001403 490279742003236 490419751001419 490211101004027 490059801001368
490039601003032 490211105002096 490190003003141 490279743001258 490279743001259
490039601001057 490439643061027 490279743001443 490379782001720 490572101001106
490419751003047 490039601001065 490039601003497 490419755002154 490451307031986
490379781001642 490211105002093 490279743003034 490379782001878 490039601002019
490572101001157 490190003003116 490572101001046 490011002001743 490230102003234
490532701001187 490379781001637 490251301002069 490379782001187 490572101001041
490379781001619 490379781001139 490059801001406 490039601003434 490419755002099
490279742003255 490279743003014 490230102003355 490039601001043 490572101001235
490572101001335 490299702001288 490379782001889 490211101001066 490059801001413
490279742002047 490379782001075 490379782001235 490059801001583 490211101004017
490279743002344 490439643061049 490419751001070 490059801001397 490419751001391
490490109002061 490419752001368 490190003003054 490279743003275 490451306001232
490211101004248 490011002001978 490379781001697 490379781001696 490572101001053
490572101001149 490572101001091 490379781001761 490419751001060 490532702002087
490190003003160 490211101004088 490379782001497 490279742002085 490059801001605
490572101001079 490279742003257 490490109002909 490190003003187 490490109002204
490490109002035 490490109002129 490379782001336 490039601003028 490490101131476
490419752001015 490419751001065 490419751004106 490532703004023 490419751001385
490211103001003 490230101002063 490572101001025 490039601002015 490059801001438
490379782001991 490490109002153 490279742002418 490230102003207 490379781001391
490039601003425 490039601003031 490379782002001 490190003003137 490279741001415

490419751001032	490419751001367	490190003003242	490379781001747	490379782001507
490059801001588	490572101001043	490190003003114	490439643061082	490451307033140
490059801001577	490419751001386	490419752001575	490351101032043	490011002001118
490572101001066	490059801001395	490379781001791	490419751001045	490532701001147
490230102003425	490532702001246	490211101001080	490279742003232	490572101001083
490490106002200	490279743002680	490572101001449	490279743002452	490279742003004
490419751001389	490279743002951	490419751004095	490439643062015	490059801001646
490532701003089	490170004001172	490572101001124	490279741001305	490379782001452
490419751001384	490039601003037	490572101001441	490190003003051	490490109002914
490059801001445	490379781001371	490572101001450	490419752001058	490419751001037
490379781001755	490011002001166	490419752002073	490230102003217	490279743001373
490532701001230	490251301002000	490532702001247	490379781001920	490379782002000
490279742003272	490532701003001	490011002001385	490279743001448	490379782002037
490419753001030	490419752001083	490011002001730	490379781001732	490419752001543
490190003002337	490379781001533	490532702001010	490230102003496	490059801001405
490279743001265	490419755002124	490039601001132	490419751001043	490532701001125
490490109001095	490279743003246	490379782001883	490190003003348	490419754001088
490230102003562	490059801001705	490190003003144	490532701003010	490379782001896
490011002001701	490419752001542	490532701003047	490379781001608	490419751001055
490059801001674	490519405001413	490351101032009	490279743002857	490399722001568
490572101001038	490279741001200	490279741001317	490230102003280	490230102003625
490230102002283	490379782001306	490011002001049	490379782001050	490059801001222
490379781001618	490279743001242	490279743001266	490059801001573	490190003003210
490379781001721	490572101001162	490572101001060	490059801001714	490572101001436
490572101001055	490379781001705	490490109002226	490230102003216	490211101004048
490519405001940	490379781001085	490279743001257	490319601002315	490572101001145
490279742001011	490279741001233	490519405001406	490419751001052	490111254033082
490419752001412	490211101001096	490279742002044	490532701001233	490251301002024
490279741001074	490572101001172	490059801001661	490279743001270	490230102003002
490279743001269	490419755002014	490419752001371	490439643061067	490279742002415
490351101032006	490572101001056	490379781001579	490379781001386	490190003002658
490279743001263	490059801001596	490572101001146	490279742002065	

CERTIFICATION

STATE OF CALIFORNIA)

COUNTY OF SAN DIEGO)

I, Robert Blair, state that I am the President of Viasat Carrier Services, Inc.; that I am authorized to make this Certification on behalf of Viasat Carrier Services, Inc.; that the foregoing Application of Viasat Carrier Services, Inc. for Designation as an Eligible Telecommunications Carrier was prepared under my direction and supervision; and that the contents are true and correct to the best of my knowledge, information, and belief.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 26 day of September, 2018.

Robert Blair

Robert Blair
President
Viasat Carrier Services, Inc.
349 Inverness Drive South
Englewood, CO 80112

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 26 day of September, 2018, by Robert Blair proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.



Stacy Nguyen
Signature of Notary Public