

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In the Matter of) Docket No. _____
)
Application 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)

**APPLICATION 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 Application for designation as an Eligible Telecommunications Carrier ("ETC") to the Public Service Commission of Florida ("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 Florida³ 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 Application, 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 Application, Viasat requests an affirmative statement that it should seek ETC designation from the FCC. The FCC has provided that applicants 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 Application, 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 Florida Secretary of State to do business in Florida 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. Via+sat will also rely on the significant managerial and technical expertise of VSI.

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.

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 Application should be provided to:

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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 bidder in 685 Census Block Groups covering Florida. *See Exhibit A.* In accordance with the FCC's

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.

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 685 Census Block Groups in Florida. 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 Application promptly and grant Viasat ETC designation in the Census Blocks identified in this Application 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 now provides high-quality broadband service to end users, and affords millions of Americans—

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.

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.

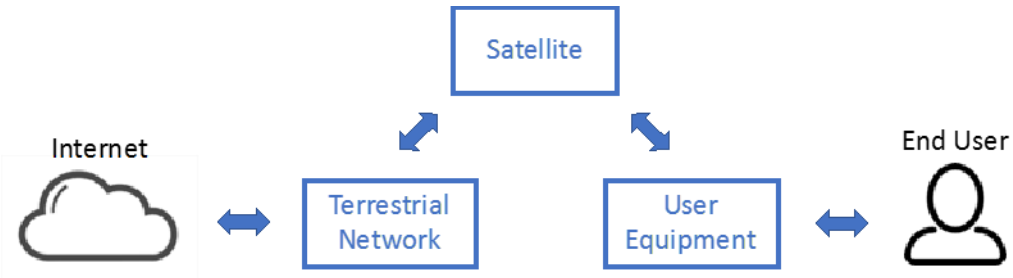
B. Viasat’s Network Architecture

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).

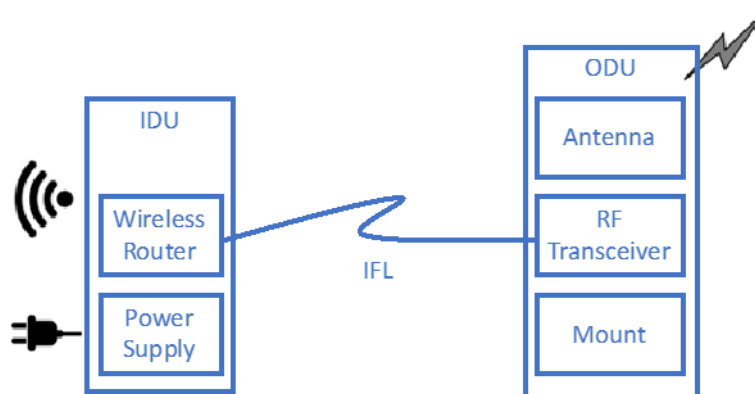


Figure: Viasat User Terminals

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

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

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, the FCC described holding the CAF II Auction as a step to "the goal of closing the digital divide for all

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).

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 \$5.8 million in federal funding over the next ten years to bring high-quality, innovative voice and broadband services to consumers in underserved portions of Florida. 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 Application will serve the public interest through the deployment of broadband and voice services to unserved and underserved high-cost areas in Florida, support investment in facilities and equipment, and expand the number of competitive providers serving rural areas in Florida. Designating Viasat as an ETC will permit the company to receive CAF II Auction funds designated for Florida, 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 Florida, helping to close the digital divide for residents of Florida, 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 Florida through the employment of Viasat’s network of independent installers and dealers. Because granting Viasat’s Application will allow it to use the CAF II funds as intended to expand voice and broadband service in Florida, 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. If the Commission will not exercise jurisdiction to review this Application, Viasat requests an affirmative statement that it should seek ETC designation from the FCC.

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

Respectfully submitted,

Viasat Carrier Services, Inc.

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Dated: September 26, 2018.

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

120010022103105	121050144001007	121050153012024	121130102002001	120559616021076
120860106171010	120632110001096	120570138011103	121150027123241	120860101931029
120299702002355	120231105001151	120479603001083	120330011032019	120299701021192
120010016044019	120990002143033	121050156002107	120860004084015	120860153001012
120791102001059	120570141171005	121050141251014	120990078221074	121050161001024
120791102001055	121150022032079	121079506003013	120570102141000	121319503021073
121050156002037	120759704001187	121050153021044	120330038001371	120759703011106
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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
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.





Signature of Notary Public