

STATEMENT OF POLICY REGARDING CUSTOMER PROPRIETARY NETWORK INFORMATION

In accordance with Section 222 of the Communications Act and the Federal Communications Commission's ("FCC") CPNI Rules (47 C.F.R. Section 64.2001, et seq.), ViaSat, Inc. ("ViaSat" or the "Company") files this Statement of Policy outlining the Company's procedures for accessing, using and storing Customer Proprietary Network Information ("CPNI").

ViaSat provides telecommunications services to retail customers. Because ViaSat may access, use, or store CPNI when providing these types of services, the Company undertakes the steps outlined in this Statement of Policy to protect CPNI from unauthorized access or misuse.

Definition of CPNI

Under federal law, CPNI is certain customer information obtained by a telecommunications provider during the course of providing telecommunications services (including interconnected VoIP) to a customer. This includes information relating to the quantity, technical configuration, type, destination, location, and amount of use of a telecommunications service subscribed to by any customer of a telecommunications carrier.

Examples of CPNI include information typically available from telephone-related details on a monthly bill such as the types of services purchased by a customer, numbers called, duration of calls, directory assistance charges, and calling patterns. CPNI does not include names, addresses, and telephone numbers, because that information is considered subscriber list information under applicable law.

Use of CPNI

It is the policy of ViaSat not to use CPNI for any activity other than as permitted by applicable law. Any disclosure of CPNI to other parties (such as affiliates, vendors and agents) occurs only if it is necessary to conduct a legitimate business activity related to the services already provided by ViaSat to the customer. Except in instances where ViaSat is required by law to disclose CPNI, such as through subpoenas or other requests by law enforcement officials, or if the intended use is permitted by FCC Rules, ViaSat will first obtain the customer's consent prior to using or sharing CPNI.

Disclosure of CPNI

ViaSat prohibits the release of CPNI based upon a customer-initiated telephone call except under the following three (3) circumstances.

- When the customer has a pre-established password;
- When the information requested by the customer is to be sent to the customer's address of record; or
- When ViaSat validates the customer by calling the customer's telephone number of record and discusses the information with the party initially requesting the CPNI information.

Online Access to CPNI

If ViaSat grants online access to CPNI, prior to allowing the customer online access to CPNI stored online, the Company authenticates a customer by using a pre-established password, which does not contain readily available biographical or account information.

Password Authentication Procedures

To establish a password, ViaSat authenticates the identity of the customer without the use of readily available biographical or account information. The Company may create a back-up customer identification method in the event a customer misplaces or forgets a password, but such alternative customer authentication will not depend on readily available biographical or account information. If a customer cannot provide the correct password or the correct response for the back-up customer authentication method, the customer may not access his or her CPNI and must establish a new password.

Account Change Notification

ViaSat notifies customers immediately of any account changes, including address of record, authentication, online account and password related changes.

Disclosure to Business Customers

ViaSat may negotiate alternative authentication procedures for services that the Company provides to business customers that have a dedicated account representative and a contract that specifically addresses the protection of CPNI.

Employee Training Policies and Disciplinary Procedures

All ViaSat employees with access to CPNI are trained as to when they are, and are not, authorized to use CPNI. Through this training, ViaSat emphasizes to its employees the importance of compliance with the Communications Act and FCC Rules regarding the use, disclosure, and access to CPNI to be very important.

Violation by Company employees of such CPNI requirements will lead to disciplinary action up to and including termination, depending upon the circumstances of the violation (including the severity of the violation, whether the violation was a first time or repeat violation, whether appropriate guidance was sought or received from a supervisor, and the extent to which the violation was or was not deliberate or malicious).

Use of CPNI in Sales and Marketing Campaigns

ViaSat does not use CPNI in any marketing campaigns.

Third Party Use of CPNI

To safeguard CPNI, prior to allowing third parties to have access to customers' individually identifiable CPNI, ViaSat requires all such third parties to enter into a confidentiality agreement that ensures compliance with this Statement of Policy. ViaSat requires such third parties to acknowledge and certify that they may only use CPNI for the purpose for which that information was provided.

ViaSat does not market or sell CPNI information to any third party.

Law Enforcement Notification of Unauthorized Disclosure

If an unauthorized disclosure of CPNI occurs, ViaSat shall provide notification of the breach within seven (7) days to the United States Secret Service ("USSS") and the Federal Bureau of Investigation ("FBI").

ViaSat shall wait an additional seven (7) days from its government notice prior to notifying the affected customers of the breach.

Notwithstanding the above, ViaSat shall not wait the additional seven (7) days to notify its customers if the Company determines there is an immediate risk of irreparable harm to the customers.

ViaSat shall maintain records of discovered breaches for a period of at least two (2) years.

Customer Complaints

ViaSat has not received any customer complaints in the past year concerning the unauthorized release of or access to CPNI.

Contact Information

Individuals or entities that have questions about this Statement of Policy and CPNI Certification or the use of CPNI by ViaSat may contact the company's outside legal counsel, The *CommLaw* Group at (703) 714-1300.

Actions taken against Pretexters

ViaSat has not taken any actions against data brokers before state commissions, state or federal courts, or the FCC in the past year. ViaSat has no information, other than information that has been publicly reported, regarding the processes that pretexters are using to attempt to access CPNI.

Annual CPNI Certification

Pursuant to FCC regulations, 47 C.F.R. § 64.20089(e), ViaSat will annually submit to the FCC, prior to March 1st, a CPNI Certification of Compliance and accompanying Statement of Policy regarding the company's CPNI policies and operating procedures. These documents certify that ViaSat complied with federal laws and FCC regulations regarding the protection of CPNI throughout the prior calendar year.

ViaSat, Inc.

Annual CPNI Certification
47 C.F.R. § 64.2009(e)
EB Docket No. 06-36

COMPANY NAME: ViaSat, Inc.
REPORTING PERIOD: January 1, 2013 - December 31, 2013
FILER ID: 829952
OFFICER: Kevin Harkenrider
TITLE: Senior Vice President of Broadband Services

I, Kevin Harkenrider, hereby certify that I am an officer of ViaSat, Inc. ("ViaSat") and that I am authorized to make this certification on behalf of ViaSat. To the best of my knowledge, ViaSat has established operating procedures that are adequate to ensure compliance with the Federal Communications Commission's rules governing Customer Proprietary Network Information ("CPNI"), to the extent that such rules apply to ViaSat or to any of the information obtained by ViaSat. See 47 C.F.R. § 64.2001 et seq.

Attached to this certification is an accompanying statement explaining the procedures ViaSat employs to ensure that it complies with the requirements set forth in 47 C.F.R. § 64.2001 et seq. of the Commission's rules, to the extent that such requirements apply to ViaSat or to the information obtained by ViaSat.

Signed: 
On behalf of ViaSat, Inc.

Date: 2/20/14