

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of )  
 )  
FCC Seeks Public Comments on Report on ) GN Docket No. 14-25  
Process Reform )  
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**COMMENTS OF VIASAT, INC.**

ViaSat, Inc. (“ViaSat”) submits the following comments supporting the proposals in the Report on FCC Process Reform (the “Report”) in the above-referenced proceeding. ViaSat welcomes the Commission’s efforts at reforming its procedures to enable greater efficiency and transparency in the agency’s actions, which will facilitate more effective provision of critical communications services by Commission licensees.

ViaSat is an innovator in satellite communications, improving the performance and bandwidth efficiency of satellite networks while reducing their costs. ViaSat is currently a leading provider of satellite-based broadband services to consumer, enterprise, and government users, and offers broadband satellite service throughout the United States. ViaSat’s new Exede® service has revolutionized the broadband industry by offering speeds of up to 12/3 Mbit/s, and is winning customers from terrestrial competitors.<sup>1</sup> ViaSat urges the Commission to prioritize reform measures that will help Commission staff expedite the consideration and grant of pending applications, which will help to speed the deployment of these types of innovative services to the public.

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<sup>1</sup> See Letter to FCC from ViaSat, Inc., WC Docket No. 10-90, Att. at 6-8 (Sept. 19, 2012).

For satellite operators, the recommendations specific to improving the International Bureau's procedures and guidance are particularly important. Recommendation 5.8, which seeks to improve the ITU notification process, is critical to ensuring that U.S. satellite license applicants can establish the international priority needed to provide a level of certainty required to commit the significant investment it takes to deploy a satellite network. ViaSat urges the Commission to implement procedures that would allow satellite operators to submit advance publication information ("API") to the Commission for submission to the ITU in advance of filing a full satellite application with the Commission. Requiring satellite applicants to file a satellite application, which is made publicly available immediately upon filing, prior to submitting an API filing to the ITU, puts the applicant at a competitive disadvantage vis-à-vis satellite operators that file at the ITU through other administrations. Notably, the recommendation to improve the ITU notification process could be implemented without a rule change, as it simply would require a change the staff's practices.

Moreover, recommendations that would provide clearer guidance to satellite operators regarding the Commission's policies and practices regarding satellite licensing and the availability of spectrum and orbit resources would enable satellite operators to plan their future networks more effectively and efficiently. Recommendation 5.11, which seeks to improve access to satellite licensing, orbital location and frequency band information, is consistent with the Commission's goals to improve transparency in its decision-making processes. Providing ready access to prior decisions and information on currently operating satellite networks would allow potential satellite applicants to more quickly identify available spectrum and orbital resources and technologies that can be implemented. Similarly, adopting Recommendation 5.12, to publish explanatory materials on satellite licensing, would provide potential applicants with

useful direction regarding the issues and considerations that arise in licensing proceedings. Therefore, ViaSat supports implementation of these recommendations.

ViaSat also supports Recommendation 2.12, to explore making the application fee structure more consistent and equitable. The Commission should commence a proceeding to evaluate fee structures among all services to determine whether application fees across different services should be more closely aligned, based on the use of Commission resources in processing the applications. For instance, earth station application fees are significantly higher than fees for wireless radio service applications. While the large disparity may be justified in some instances, the Commission should review the differences to determine whether some of these fees should be aligned more closely for certain services.

More generally, ViaSat is in favor of suggestions that would simplify and expedite decisions in rulemaking proceedings and other Commission actions. In particular, ViaSat supports the following recommendations: (i) Recommendation 3.8, to include proposed rules in NPRMs whenever possible, and draft proposed and final rules early in the process of developing decision documents; (ii) Recommendation 3.9, to draft shorter decisional documents where possible; (iii) Recommendation 3.10, to adopt policies for minimum comment periods for significant FCC regulatory actions, including rulemakings; and (iv) Recommendation 3.12, to consider listing specific questions with rebuttable presumptions at the end of an NRPM. Adopting these recommendations would streamline the rulemaking process, making it more efficient and easier for both Commission staff and interested parties to consider the relevant issues in a more methodical way. In addition, each of these recommendations could facilitate broader participation in such proceedings as a result of greater transparency and by focusing the issues more clearly for the public.

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ViaSat requests that the Commission consider these views in implementing the process reform recommendations identified in these comments. ViaSat urges the Commission to act quickly on its process reform efforts to allow Commission staff to continue its focus on its primary regulatory objectives.

Respectfully submitted,

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/s/

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