

**Before the  
NATIONAL TELECOMMUNICATIONS AND INFORMATION ADMINISTRATION  
Washington, D.C. 20230**

In the Matter of	)	
	)	Docket No. 180427421-8421-01
Improving the Quality and Accuracy of	)	
Broadband Availability Data	)	

**COMMENTS OF VIASAT, INC.**

Viasat, Inc. submits these comments in response to the Request for Comments (“RFC”) published in the *Federal Register* on May 30, 2018 in connection with the above-captioned proceeding. In the RFC, NTIA seeks public input on “actions that can be taken to improve the quality and accuracy of broadband availability data, particularly in rural areas,” consistent with congressional direction in the Consolidated Appropriations Act of 2018. Among other things, the RFC seeks to identify: (i) additional sources of broadband availability data and (ii) new approaches, tools, technologies, or methodologies that could be used to capture relevant data. Viasat submits these brief comments to highlight one approach/data source that is particularly promising with respect to satellite broadband availability.

In just ten years operating its own satellites, Viasat has become a leading provider of communications solutions across a wide variety of technologies (both terrestrial and satellite), and it uses a fleet of spacecraft to provide broadband service to fixed and mobile, to residential, enterprise and government customers. Viasat has revolutionized the satellite industry by reducing the “cost per bit” of delivering broadband service, providing a high-quality service to end users, and affording millions of Americans an effective competitive alternative to wired and wireless terrestrial services. Today, Viasat connects over three million devices per month on

aircraft and offers services currently meeting and exceeding the 25/3 Mbps speed threshold, including the first satellite-delivered 100 Mbps broadband service.

Viasat appreciates NTIA's efforts to improve the quality and accuracy of broadband availability data, as well as its acknowledgment that significant obstacles may impede the ability of service providers to furnish certain types of data. Fortunately, Viasat believes that there are additional data sources and approaches that can be efficiently used without imposing undue burdens on the parties providing such data. In the case of satellite providers, Viasat believes that data can and should be captured in the form of Geographic Information System (GIS) shapefiles.

The GIS shapefile is an industry-standard electronic file format that Viasat, the Federal Communications Commission, and other service providers use regularly. The GIS shapefile incorporates simple geometric shapes (*e.g.*, points and lines) that are used to define the satellite coverage area. The GIS shapefile shows all locations that are able to receive service at the specified level. As such, the GIS shapefile provides an efficient way to succinctly capture coverage over broad geographic areas without the burden of listing every census block within that area. At the same time, the perimeter depicted by the shapefile can cut across pre-defined geographic lines (*e.g.*, the census block or country boundaries), thus providing more granular and accurate coverage information. With the GIS shapefile, it is possible to zoom into a household level-view and see exactly which households are within the coverage area and which households are served within any given census block, without assuming that the entire census block is served.

Although the administrative and technical burdens associated with the use of GIS shapefiles are, in some cases, more significant than those associated with current reporting approaches (*e.g.*, FCC Form 477), Viasat believes that the GIS shapefile format is the more

accurate reporting method in the context of satellite services. Therefore, Viasat fully endorses this approach.

Respectfully submitted,

/s/ Christopher J. Murphy

Christopher J. Murphy  
Associate General Counsel, Regulatory Affairs  
Viasat, Inc.  
6155 El Camino Real  
Carlsbad, CA 92009  
760.893.3269

July 16, 2018