

UT-240508

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Mr. Jeff Killip - Executive Director and Secretary Washington
Utilities & Transportation Commission
P.O. Box 47250
Olympia, Washington 98504-7250

**RE: Viasat Carrier Services, Inc. - 2024 Annual Lifeline and High-Cost
Recertification Filing and Annual Plan for 2025– SAC 529028**

Dear Staff,

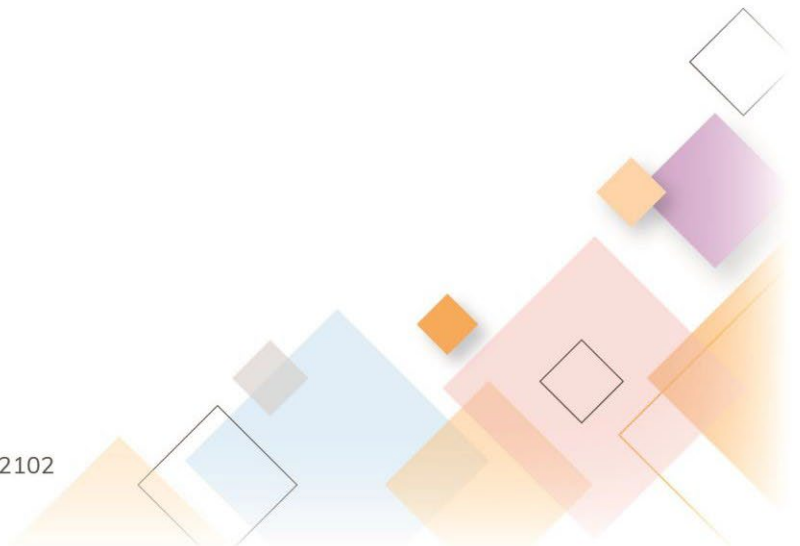
In accordance with WAC 480-123-060 to WAC 480-123-080, Viasat Carrier Services, Inc. - Study Area Code 529028 - submits its Annual Eligible Telecommunications Carrier Report for 2023 ("2023 Report"), Annual Plan for 2025, and officer certification.

If you have any questions regarding this filing, please contact me at (703) 714-1324 or map@compliancegroup.com.

Respectfully Submitted,



Marsha A. Pokorny
Senior Managing Consultant on behalf of Viasat Carrier Services, Inc.



Viasat Carrier Services, Inc. (SAC 529028)

Annual Eligible Telecommunications Carrier Report for 2023 and 2025 Annual Plan

Viasat Carrier Services, Inc. (“Viasat”), study area code (“SAC”) 529028,¹ submits its Annual Eligible Telecommunications Carrier Report for 2023 (“2023 Report”) and Annual Plan for 2025 in accordance with WAC 480-123-060 to WAC 480-123-080.

I. VIASAT ETC REPORT FOR 2022

A. Annual Certification of Eligible Telecommunications Carriers

With this filing, Viasat requests continued certification as an eligible telecommunications carrier (“ETC”) in Washington. Viasat began providing supported services on December 15, 2022. In accordance with WAC 480-123-060, **Exhibit A** contains the certification that all federal high-cost universal service support was used in the preceding calendar year (2023) and will be used in the coming calendar year (2025) for the “provision, maintenance, and upgrading of facilities and services for which the support is intended.”

B. Report as Required by WAC 480-123-070 for Calendar Year 2023

1. Report on use of federal universal service funds and benefits to consumers (WAC 480-123-070(1)(a) and (b));

- A substantive description of investments made, and expenses paid with support from the federal high-cost fund;
 - In calendar year 2023, Viasat continued work to develop and improve its service offers and infrastructure to support the Connect America Fund Phase Two Auction (CAF II)-awarded census blocks and requirements, and to ensure its compliance with upcoming FCC service expansion requirements. Beginning in February of 2020, among other things, Viasat underwent an end-to-end upgrade of all internal systems. This upgrade was necessary to give Viasat the functionality to offer the CAF II service in all awarded states, including the ability to determine availability of CAF II services by census block.
 - Starting in early February of 2021 and continuing through the launch of services in December of 2022, Viasat’s engineers tested versions of the CAF II service offers in certain markets. This testing was intended to (1) validate the performance of newly upgraded internal systems, (2) verify the service configurations necessary to meet FCC service standards, (3) verify the functionality of Viasat’s CAF II service availability tool by census block, and (4) build CAF II-specific service plans and customer self-help tools for such plans.
 - In order to ensure a smooth rollout of CAF II services by the end of 2022, Viasat also implemented an initial, limited launch of CAF II-compliant services in select census blocks. The limited launch allowed Viasat to

¹ The Commission designated Viasat as an eligible telecommunications carrier (“ETC”) in certain areas in Washington by Order dated January 31, 2019 in Docket UT-180839. *See* In the Matter of the Petition of Viasat Carrier Services, Inc. Seeking Designation as an Eligible Telecommunications Carrier in the state of Washington pursuant to 47 U.S.C. § 214(e)(2), Order Granting Eligible Telecommunications Carrier Designation, Docket No. UT-180839, Order No. 1 (Jan. 31, 2019).

- test and refine its approach to CAF II implementation.
 - Viasat continued to learn from the limited launch even as it completed the implementation of the internal systems and processes that were necessary to successfully launch CAF II services in all supported states, including Washington, on December 15, 2022. Among other things, Viasat worked to improve functionality and customer experience based upon what it had discovered from the limited launch. These improvements included, but are not limited to, necessary back-office development to improve its service availability tool, development to allow customers to more easily transition from standard Viasat plans to CAF II plans, and improved marketing development to target eligible customers, including tribal land customers.
 - In addition to continued improvement of its CAF II services and offers in 2023, Viasat completed the construction and launch of a new satellite that was intended to be used to support the needs of the CAF II service as it is rolled out across the country. Unfortunately, the satellite suffered an anomaly and will not be used to support the CAF II services at this time; however, Viasat continues to be able to support its CAF II program with its existing satellite structure. Further it continues to work on an additional satellite that will be used to support future CAF II enhancements, as discussed below.
- The company's gross capital expenditures and operating expenses made with federal high-cost support received by the ETC in the preceding calendar year along with a description of major projects and affected exchanges.
 - Viasat received \$703,186.44 in CAF II funds for the State of Washington in 2023. All of those funds were used for capital expenditures, including for the aforementioned upgrades to Viasat's systems and infrastructure, testing, mapping technology, construction and launch of the newest Viasat satellite, as well as the expansion of the CAF II services on November 29, 2023.
- A substantive description of the benefits to consumers that resulted from the investments and expenses reported pursuant to (a) of this subsection.
 - As indicated above, Viasat has used the entirety of the 2023 CAF II funds for Washington to develop the necessary systems, infrastructure, hardware, and technology to offer the CAF II services in the awarded census blocks, while meeting the required quality, speed, and latency requirements. Customers in Washington will benefit from a high-quality, low-cost product that provides high-speed internet and Voice options to areas that are in desperate need of those services.

2. Local Service Outage Reports (WAC 480-123-070(2))

Viasat had 3 local outages in 2023. Please see the notes regarding each, below.

1. Date: 4/2/23; Total Impact Time: 428 min.; CAF Subscribers Impacted: 1; Cause: Circuit issue, Core Node Circuit was down and additional Core Node Circuit was taking errors.; Resolution: The vendor restored service.
2. Date: 9/20/23; Total Impact Time: 70 min.; CAF Subscribers Impacted: 1; Cause: SMAC did not self-recover through a failover after a hardware failure in the Core Node. Resolution: SMAC failure was repaired.
3. Date: 11/21/23; Total Impact Time: 70 min.; CAF Subscribers Impacted: 3; Cause: SMAC failure. Resolution: Failure was repaired via a hard reboot of the SMAC to restore

services.

3. Report on failure to provide service (WAC 480-123-070(3))

Viasat had only one Washington CAF II customer who was unable to be served in 2023. This was due to the customer's location being too densely forested. A technician traveled to the property to attempt to install the service; however, the property was too heavily treed to be able to achieve an appropriate line of sight to the satellite.

4. Report on complaints per one thousand connections (WAC 480-123-070(4))

Viasat did not have Washington customer complaints in 2023.

5. Compliance with applicable service quality standards (WAC 480-123-070(5))

Viasat launched its supported services on December 15, 2022, and has continued to comply with all FCC and Commission requirements, including applicable service quality standards and consumer protection rules. Included in **Exhibit A** is Viasat's certification of substantial compliance with this requirement.

6. Certification of the ability to function in emergency situations (WAC 480-123-070(6))

Viasat has 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 of the company's 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.

7. Advertising certification, including advertisements on Indian reservations (WAC 480-123-070(7)).

Viasat launched supported services on December 15, 2022. Since that time, it has been advertising and publicizing the availability of and charges for USF- supported services and Lifeline services using media of general distribution, including advertisements and publications reasonably calculated to reach those likely to qualify. The certification for this section is included in **Exhibit A**.

II. Annual Plan for Universal Service Support Expenditures as Required by WAC 480-123-080

Viasat met the December 31, 2022, 40% buildout milestone in Washington when it launched CAF services to over 40 percent of its awarded locations on December 15, 2022. It met the December 31, 2023, 60% buildout milestone in Washington when it launched CAF services to over 60 percent of its awarded locations on November 29, 2023. In 2023 and 2024, Viasat has continued to invest the necessary resources to offer and support the requisite plans, including CAF II-compliant broadband and voice services, to all CAF-II awarded census blocks in Washington, in compliance with each remaining buildout milestone. In addition, Viasat is completing the

construction of an additional satellite that will be used to better support its CAF II customers in Washington, and in all its awarded locations. Viasat also continued many of its efforts, mentioned above, to improve the functionality and customer experience for its customers. In 2024 and 2025, Viasat anticipates launching to 80 and then to 100 percent of its CAF II-awarded locations in Washington and other states.

Case Number	Impact Start Time	Beam/Location Impacted	Total Impact Time (min)	Subscribers Impacted	Root Cause	Short Description	Description	Resolution Type	Geographic Location	
9804719	3/13/2023 5:05	Config Item: smts01.sea.gw.sb2.wldbl	30		Antenna	Multiple card resets on the SMTS caused traffic to drop and the main antenna to have HPA Overdrive Faults and failover to the spare. Once the SMTS was stabilized the RF Team normalized the antenna.	SEA AUG - SMTS01 - Loss Of UT's. Multiple card resets on the SMTS caused traffic to drop and the main antenna to have HPA Overdrive Faults and failover to the spare.. Once the SMTS was	Failed Over	WA State	
9835914	4/2/2023 11:20	Beam: 11306/306L	706	428	1	Circuit	Circuit ID: 441385433 - NYC CORE02 to RTV CORE01 was hard down. Circuit ID: 440484216 - CHI CORE02 to DEN CORE01 was taking errors. SMGs 7 and 8 were the only two that have SANs served in Chicago,	An outage has been detected at - naw03 - Viawest Denver (aka WDC1) User Beam(s) AMER - 763,781,706 - impacting 3309 subscribers RA from SMTS Team, asking about weather in SEA, 0 UT's online. The main was failed over to spare for	Vendor Restored	WA State
9869001	4/19/2023 0:20	Site: SEA-AUG-SB2	70	978	ACU	Main antenna on spare for PM's, spare SRT tracked off. RF had to manually point and peak antenna to recover.	RF PM's. The spare had an SRT fault and tracked off. TAC escalated to the RF on-call who had to manually peak the antenna before placing it back	Changed Configuration	WA State	
10148166	9/20/2023 11:05	Beam: 10306/306R	706	70	1	SMAC	dnv10-s1 and dnv12-s1 did not self-recover through a failover after a hardware failure in the Core Node DCAR.	An Outage has been detected at - naw03 - Viawest Denver (aka WDC1) User Beam(s) AMER - 706,739,702,763,766 - impacting 8480	Repaired	WA State
10236303	11/21/2023 17:45	Beam: 11351/351L	751	40	3	SMAC	A hard reboot of SMAC was performed in order to restore services. Post Mortem to be presented by	An Outage has been detected at - nac01 - Chicago Core Node Data Center User Beam(s) AMER -	Hard Reboot	WA State

Service Area	Beam	Network	SAN/Gateway	Configuration ID	
	10058 or		Dependent on Satellite	10058/058R	
458	11058	VS2	Schedule	11058/058L	Redundant
	10306 or		Dependent on Satellite	10306/306R	
706	11306	VS2	Schedule	11306/306L	Redundant
	10349 or		Dependent on Satellite	10349/349R	
749	11349	VS2	Schedule	11349/349L	Redundant
	10351 or		Dependent on Satellite	10351/351R	
751	11351	VS2	Schedule	11351/351L	Redundant
				smts01.sea.gw.sb2.wldblu.net	
151		151 VS1	SEATTLE	macd1.smts01.sea.gw.sb2.wldblu.net	SEA-AUG-SB2
				macd2.smts01.sea.gw.sb2.wldblu.net	
				smts01.sea.gw.sb2.wldblu.net	SEA-AUG-SB2
152		152 VS1	SEATTLE	macd3.smts01.sea.gw.sb2.wldblu.net	SGU-VS1-SB2
					SGU-VS1-SB2
36		365 VS1	MILFORD	smts04.sgu.gw.sb2.wldblu.net	SGU-VS1-SB2
					SGU-VS1-SB2
66		366 VS1	MILFORD	smts03.sgu.gw.sb2.wldblu.net	SGU-VS1-SB2

Exhibit A


Viasat Carrier Services, Inc. Annual Certification

I Robert Blair, being of lawful age and duly sworn, state that I serve as President and Secretary of Viasat Carrier Services, Inc. ("Viasat").

I certify to the Washington Utilities and Transportation Commission ("Commission") under penalty of perjury under the laws of the State of Washington that the following is true and correct to the best of my knowledge:

1. The Commission designated Viasat as an eligible telecommunications carrier ("ETC") in certain areas in Washington by Order dated January 31, 2019 in Docket UT-180839;
2. The Company used all high-cost universal service funds during the prior calendar year (2023) and will use all high-cost universal service funds in the upcoming calendar year (2025) only for the provision, maintenance and upgrading of the facilities and services for which the support is intended;
3. During calendar year 2023, Viasat provided the supported services required by 47 U.S.C. § 214(e) [and has provided detailed information on the use of funds in accordance with WAC 480-123-070];
4. During calendar year 2023, Viasat complied with the applicable service quality standards and consumer protection rules as required by WAC 480-123-070(5);
5. Viasat has the ability to remain functional in emergencies and meets the applicable requirements as required by WAC 480-123-070(6) as described in Viasat's Annual Eligible Telecommunications Carrier Report for 2023 and 2025 Annual Plan; and
6. During calendar year 2023, Viasat advertised and publicized the availability of its Lifeline services in a manner reasonably designed to reach those likely to qualify for the service in accordance with WAC 480-123-070(7).

Date: June 24, 2024
Carlsbad, California



Robert Blair
President and Secretary
Viasat Carrier Services, Inc.

California Jurat with Affiant
Statement

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 24 day of June, 2024.

By Robert Blair proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.



Kimbra L. Doyle
Signature of Notary Public