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Washington Utilities and Transportation Commission  
621 Woodland Square Loop SE,  
Lacey, WA 98503

**RE: Washington UTC 2023 ETC Certification to the FCC for 2024 Federal Universal Service support – Additional Questions - Docket No. UT-230547 – Viasat Carrier Services, Inc. (SAC 529028)**

Dear Commission,

Enclosed for filing is Viasat Carrier Services, Inc.'s ("Viasat's") Supplemental Response regarding the UTC Staff's Questions Related to Equity (Informational).

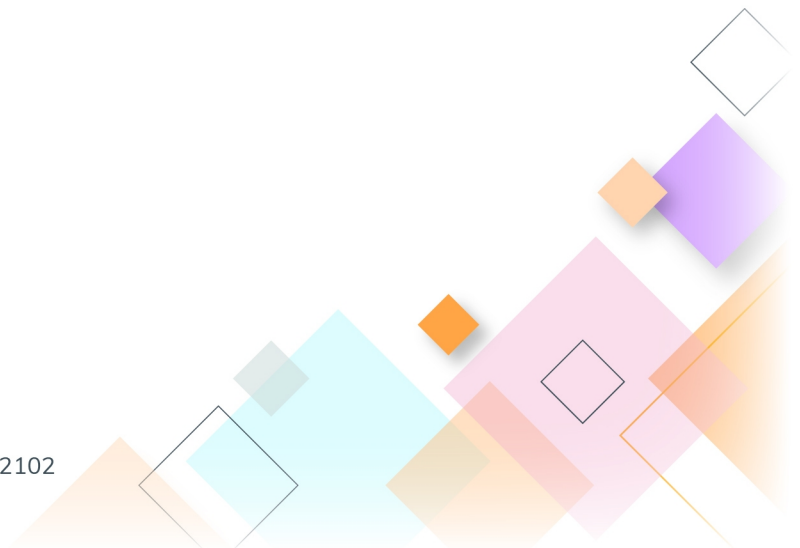
Please accept these documents as support for 2023 recertification by the Commission to the FCC for 2024 federal high-cost fund support in the CAF Phase II fund.

If you have any questions regarding this filing, please contact me at (703) 714-1324 or [map@compliancegroup.com](mailto: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 Supplemental Response to Staff  
Questions Related to Equity (Informational)**

Viasat Carrier Services, Inc. (“Viasat”), study area code (“SAC”) 529028, submits its Supplemental Response to the additional questions related to equity, below.

1. Does your company currently have a tribal outreach plan in place for services and equipment located on or provided to tribals lands of Washington state?

**Response:**

**Viasat has developed and continues to implement a comprehensive strategy to engage with tribal leaders in Washington State. This strategy is designed to foster dialogue, tailor its services and marketing efforts appropriately, and promote partnering and employment opportunities as Viasat continues to launch Connect America Fund Phase II Auction (CAF II)-supported services in the relevant tribal areas within Washington State. For example, Viasat has created a program entitled “Tribal Connect,” which aims to inform tribal leaders and members about Viasat’s lower-cost offerings and programs, including CAF II. Tribal Connect also aims to encourage dialog and participation by tribal members by incorporating an initiative to hire and train tribal members as installers of Viasat’s services, as well as a “give-back” program for when tribal members purchase Viasat’s services. In furtherance of its goals, Viasat has engaged in direct outreach to tribal authorities, attendance and presentation at tribal communication summits (including the Reservation Economic and NTTA Tribal Telecommunications Association Summits), as well as hosting webinars for Tribal leaders and stakeholders. Viasat continues to follow up on the relationships and conversations that have arisen via these methods of communication, as it also seeks new and better ways to serve tribal communities. For a more detailed description of Viasat’s tribal engagement initiatives, please see Viasat’s filing with regard to the FCC’s Tribal Engagement Obligation, attached here for reference.**

2. Does your company currently have a tribal liaison? If so, please share for information purposes only.

**Response: Viasat’s current tribal liaison is Evan Buck, Global Fixed Broadband – Business Development and Strategy.**

## (920) Tribal Government Engagement Obligation

Viasat Carrier Services, Inc. (“Viasat”) is committed to engaging directly and substantively with Tribal governments regarding its offering of services supported through the Connect America Fund (“CAF”) program on Tribal lands. Viasat is keenly aware of the difficulties faced by Tribal communities in accessing robust broadband and voice services. As the Commission correctly noted in its Fourteenth *Broadband Deployment Report*, “[t]he remote, isolated nature of these areas, combined with challenging terrain and lower incomes, increase the cost of network deployment and entry” on Tribal lands, particularly for terrestrial technologies.<sup>1</sup> As a result of these challenges, that *Report* found that only “79% of Tribal lands are covered by fixed terrestrial 25/3 Mbps services and mobile 4G LTE with a speed of 5/1 Mbps.”<sup>2</sup>

As a provider of satellite broadband services—which are well suited for areas where terrestrial deployments may be cost-prohibitive—Viasat recognizes and embraces its responsibility to promote improved connectivity for Tribal populations. And as a recipient of federal support through the CAF Phase II auction, Viasat is particularly cognizant of its Tribal engagement obligations under Section 54.313(a)(5) of the Commission’s rules in connection with its offering of CAF-supported services on covered Tribal lands.<sup>3</sup> That rule requires that the scope of a CAF recipient’s engagement with relevant Tribal governments encompass: (i) a needs assessment and deployment planning with a focus on Tribal community anchor institutions; (ii) feasibility and sustainability planning; (iii) marketing services in a culturally sensitive manner; (iv) rights of way processes, land use permitting, facilities siting, environmental and cultural preservation review processes; and (v) compliance with Tribal business and licensing requirements.<sup>4</sup>

Viasat has developed and continues to implement a comprehensive strategy to engage with Tribal leaders across all these topic areas, in a manner designed to foster dialogue, tailor its services and marketing efforts appropriately, and promote partnering and employment opportunities as Viasat continues to launch CAF-supported services in the relevant Tribal areas. These and other engagement initiatives are central to Viasat’s “Tribal Connect” program, established in part to ensure compliance with Viasat’s CAF obligations. Viasat hired a senior individual and engaged with several prominent third-party Tribal experts to help spearhead these initiatives, further promote these important programs, expand Tribal outreach, and enhance the Tribal Connect program to bring heightened awareness of service options to Tribal communities. Below is an overview of Viasat’s Tribal engagement efforts and planned initiatives with respect to the five areas specified in Section 54.313(a)(5).

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<sup>1</sup> *Inquiry Concerning Deployment of Advanced Telecommunications Capability to All Americans in a Reasonable and Timely Fashion*, Fourteenth Broadband Deployment Report, 36 FCC Rcd 836 ¶ 20 (2021).

<sup>2</sup> *Id.* ¶ 43.

<sup>3</sup> 47 C.F.R. § 54.313(a)(5).

<sup>4</sup> *See id.*

**Needs Assessment and Deployment Planning.** As the Commission is aware, Viasat, Inc.'s satellite infrastructure already provides nationwide coverage—including in areas deemed 'unserved' by the Commission. As such, Viasat has not engaged in CAF-specific infrastructure deployment to the extent of other operators. Nevertheless, soon after the CAF Phase II auction, during the period in which Viasat was preparing its initial eligible telecommunications carrier ("ETC") applications, Viasat began developing a comprehensive contact list for Tribal authorities on all of the Tribal lands included within census blocks awarded to Viasat in the auction. Using that list, Viasat reached out to Tribal authorities in an effort to establish a dialogue regarding its planned deployment of CAF-supported services. As the Commission is aware, Viasat had extensive communications with the Office of Native Affairs and Policy and with Tribal leaders in Oregon regarding Viasat's desire to work together to bring Viasat's CAF-supported services to those areas. In preparation for the deployment in December of CAF-supported services in all twenty of the states in which it was awarded CAF funding, Viasat expanded its efforts to reach out to individual Tribal governments in applicable areas to establish a dialogue and to discuss how, when, and where Viasat planned to launch those and other services—including by determining specific Tribal service needs, the locations of anchor institutions such as schools, libraries, and hospitals on Tribal lands, Viasat's proposals for the various initiatives described herein, and its hopes for future collaboration.

Viasat sought input and assistance from multiple third-party Tribal experts and Tribal business leaders in order to better reach and understand the needs of Tribal communities. These third parties included members of Sovereign Resiliency Partners, Sagebrush Hill Group, LLC, WampWorx, Kiva Capital Group, and Google Aboriginal & Indigenous Network (GAIN). Viasat also worked closely with telehealth organizations to bring awareness to tribes of the opportunity to utilize telehealth services via Viasat's satellites on Tribal lands. Viasat directly presented to many different Tribal leaders regarding its CAF program, and the Tribal Connect program in general, at the Reservation Economic Summit: Res2022 Convention ("Res2022 Convention") in March of 2022, where Viasat sponsored its own booth. Viasat also attended the NTTA Tribal Telecommunications Association Summit in September of 2022 ("NTTA Summit"). Following both of these events, Viasat engaged separately with Tribal leader contacts made at the summits and developed relationships with leaders in this field. Finally, Viasat developed a "Tribal Connect" webinar, which was presented at the beginning of December, wherein it invited Tribal leaders and stakeholders to attend and view its presentation regarding its CAF and other Tribal-specific offerings, and how Viasat is able to partner with Tribal leaders and members to better develop broadband options on Tribal lands. Viasat continues to follow up on the relationships and conversations that began with the summits and webinar.

**Feasibility and Sustainability Planning.** Satellite broadband operators have obvious advantages over terrestrial operators in deploying services to remote Tribal areas in a feasible and sustainable manner, and Viasat is confident in its ability to make CAF-supported services available efficiently and cost-effectively in these areas. Viasat's Tribal engagement initiatives on this front therefore focus on promoting adoption—including by educating Tribal authorities about the availability and benefits of its planned offerings and by seeking to integrate members of Tribal communities as partners in the rollout of these services.

For example, as mentioned above, Viasat contracted with third-party expert Sovereign Resiliency Partners to craft an online seminar and marketing materials dedicated to educating Tribal leaders and communities regarding Viasat's communication services and the available opportunities to partner. As previously indicated, Viasat presented its Tribal Connect program, including information regarding Viasat's partnership opportunities on Tribal lands for CAF and other programs, at the Res2022 Convention and at the NTTA Summit. Viasat was able to speak

with several different Tribal leaders at the Res2022 Convention and the NTTA Summit, as well as during the Tribal Connect webinar, and continues to work to schedule new conversations with other tribes and Tribal members. Viasat also has created Tribal-specific online materials for Tribal leaders and community members who seek information and resources about Viasat's current and planned offerings. Viasat will continue to use these methods as a platform for seeking input from Tribal leaders and communities regarding the best ways to offer service on Tribal lands in a manner that maximizes feasibility and sustainability.

Furthermore, Viasat implemented a program, with the support and assistance of Tribal leaders, to partner with individual Tribal communities on educating and training community members as technicians and installers of Viasat equipment, thus creating employment opportunities directly within the communities, and encouraging even closer collaboration between the Tribal communities and Viasat. Viasat has also created a "give-back" program wherein, with each successful installation on Tribal lands and after the customer's 90-day anniversary, Viasat will donate to a Tribal fund of choice.

**Marketing Services in a Culturally Sensitive Manner.** Viasat, Inc., Viasat's parent company, has offered services to Tribal populations across the country for many years, and is attuned to the need to ensure that services are marketed in a manner that will resonate with Tribal communities and stimulate adoption. Drawing from this experience, and with the assistance and input from many of its third party experts, including Sovereign Resiliency Partners, Viasat has developed custom marketing and informational content dedicated to Tribal areas regarding its planned CAF-supported services. These efforts include leveraging the aforementioned online seminars as both an educational tool and a platform for feedback and communication about marketing efforts, in addition to targeted direct, digital, and out-of-home marketing options.

For example, Viasat provides targeted mail to individuals that reside on Tribal lands within its service areas and provides collateral (one-sheets, brochures) describing the CAF and Lifeline/Link Up options. In addition, Viasat uses digital display advertising such as targeted advertisements based on the geographic location of each area and location-based paid search ads on Google for searchers in geographic locations of each Tribal area based on keywords such as "CAF," "Connect America," "Lifeline," "Linkup," etc. Viasat also created a dedicated "Tribal Connect" webpage and telephone trackline so that Tribal members have easy access to information regarding CAF and other opportunities most relevant to them. Viasat also intends to continue to explore the efficacy of available outdoor advertising units in high-traffic zones within Tribal areas to build awareness of CAF-supported services. Feedback regarding all of these marketing and informational efforts from Tribal leaders and partners is welcomed, and it is reviewed and incorporated as necessary to better Viasat's efforts. Viasat's direct outreach efforts to Tribal leaders are intended to continue to explore these options and refine them as Viasat receives feedback and suggestions.

**Rights of Way and Other Permitting and Review Processes.** Due to the nature of its satellite network, Viasat typically does not need to obtain access to rights-of-way in local communities in order to deliver communications services to end users in those communities, and the placement of small satellite antennas at end-user locations also does not typically trigger other permitting or review processes. That said, to the extent that any Tribal authority identifies any permitting or review processes relevant to the deployment of satellite services in the course of further engagement with Viasat, Viasat will of course abide by such processes as it makes CAF-supported offerings available on Tribal lands.

**Compliance with Tribal Business and Licensing Requirements.** During Viasat's initial

ETC application process, Viasat's attempts at outreach to Tribal representatives included efforts to obtain information about any specific business licenses, certificates of authority, or other Tribal requirements necessary to conduct business on Tribal lands. For any Tribes that responded with any such requirements, Viasat promptly initiated the licensing processes. Viasat's further initiatives to reach out to Tribal leaders as it prepared to launch CAF-supported services in December included a renewed effort to ascertain whether any additional Tribal business and licensing obligations existed in the relevant areas.