

July 10, 2020

Steven V. King - Executive Director and Secretary  
Washington Utilities & Transportation Commission

P.O. Box 47250

Olympia, Washington 98504-7250

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COMMISSION

**RE: Viasat Carrier Services, Inc. – 2020 Annual Lifeline and High Cost Recertification Filing**

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 2019 (“2019 Report”), Annual Plan for 2021 and officer certification.

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  
Managing Consultant on behalf of Viasat Carrier Services, Inc.



## **Viasat Carrier Services, Inc. (SAC 529028)**

### **Annual Eligible Telecommunications Carrier Report for 2019 and 2021 Annual Plan**

Viasat Carrier Services, Inc., study area code (“SAC”) 529028,<sup>1</sup> submits its Annual Eligible Telecommunications Carrier Report for 2019 (“2019 Report”) and Annual Plan for 2021 in accordance with WAC 480-123-060 to WAC 480-123-080.

#### **I. VIASAT ETC REPORT FOR 2019**

##### **A. Annual Certification of Eligible Telecommunications Carriers**

With this filing, Viasat requests continued certification as an eligible telecommunications carrier (“ETC”) in Washington. Viasat did not provide supported services in 2019. Nonetheless, 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 (2019) and will be used in the coming calendar year (2021) 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 2019**

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

Viasat did not provide supported services in 2019.

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

Viasat did not provide supported services in 2019 and, therefore, does not have local service outage information to provide. At such time as Viasat provides supported services, it will submit local service outage information as required by WAC 480-123-070(2).

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

Viasat did not provide service in 2019 and, therefore, did not have unfulfilled request for service in calendar year 2019. At such time as Viasat provides supported services, it will submit a report of its unfulfilled requests for service.

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

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<sup>1</sup> 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).

Viasat did not provide supported service in 2019, and, therefore, does not have a report of complaints. At such time as Viasat provides supported services, it will submit a report on complaints.

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

Viasat did not provide supported services in 2019. At such time as Viasat provides supported services, it will 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 e 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 did not provide supported services in 2019. At such time as Viasat provides supported services, it will advertise or publicize 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 has been utilizing resources to prepare for CAF II, including developing service-availability tools, a voice only service, and developing the testing to benchmark its network against the performance requirements under CAF II. However, at this time, Viasat has not yet used the High Cost funds. Viasat has been initially using its own funds to prepare for CAF II in Washington.

## 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. Viasat did not provide supported services in 2019. Federal universal service support received by Viasat in 2021 will be used only for the provision, maintenance, and upgrading of the facilities and services for which the support is intended in accordance with WAC 480-123-060;
3. During calendar year 2019, Viasat did not provide supported services. Viasat will provide 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 2019, Viasat did not provide supported services. At such time as Viasat provides supported services it will comply 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 an 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 2019 and 2021 Annual Plan; and
6. During calendar year 2019, Viasat did not provide Lifeline services. At such time as Viasat provides Lifeline services, it will advertise and publicize 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 and Place

July 9, 2020

Carlsbad, CA, USA

DocuSigned by:

*Robert Blair*

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Robert Blair

President and Secretary

Viasat Carrier Services, Inc.