March 6, 2026

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
45 L Street, NE
Washington, DC 20554

Re: Request for Confidential Treatment; Petition to Deny of Viasat, Inc.; ICFS File No. SAT-LOA-20260108-00016

Dear Ms. Dortch:

Pursuant to the Freedom of Information Act ("FOIA") and Sections 0.457(d) and 0.459 of the Commission's rules, 5 U.S.C. § 552(b); 47 C.F.R. §§ 0.457(d), 0.459, Viasat, Inc. ("Viasat") respectfully requests that the Commission withhold from public inspection and accord confidential treatment to the information marked as confidential in the unredacted version of Viasat's Petition to Deny submitted today in the above-referenced proceeding ("Petition"). In addition to the confidential, unredacted version being submitted via FedEx, Viasat is submitting a public, redacted version of its Petition through the Commission's International Communications Filing System.

The Petition contains confidential information relating to the coordination of satellite systems pursuant to procedures codified in the International Telecommunication Union's Radio Regulations—including information from documents "prepared in connection with coordination, notification, and recording of frequency assignments and Plan modifications, including . . . documents and correspondence prepared in connection with operator-to-operator arrangements."[1] The portion of this submission marked as confidential accordingly falls within the categories of materials not routinely available for public inspection and must be accepted by the Commission on a confidential basis pursuant to Section 0.457(d)(vii)(B) of the Commission's rules and 5 U.S.C. § 552(b)(4).

In addition, the portion of this submission marked as confidential relates to commercially sensitive information regarding international coordination agreements negotiated between Viasat and another satellite operator, and therefore falls within Exemption 4 of FOIA and is entitled to

[1] 47 C.F.R. § 0.457(d)(vii)(B).

confidential treatment under the Commission's rules. *See* 5 U.S.C. § 552(b)(4); 47 C.F.R. § 0.457(d).

In support of this request for confidential treatment and pursuant to Section 0.459(b) of the Commission's rules, 47 C.F.R. § 0.459(b), Viasat provides the following information:

1. **Identification of Specific Information for Which Confidential Treatment Is Sought (47 C.F.R. § 0.459(b)(1)).** Viasat respectfully requests that the Commission withhold from public inspection, and accord confidential treatment to, the information marked as confidential—using the signals {{BEGIN CONFIDENTIAL}} and {{END CONFIDENTIAL}}—in the unredacted version of the Petition (the "Confidential Material").

2. **Description of Circumstances Giving Rise to the Submission (47 C.F.R. § 0.459(b)(2)).** The Confidential Material is being filed voluntarily in connection with Viasat's Petition seeking denial of the application at issue in the above-referenced proceeding.

3. **Explanation of the Degree to Which the Information Is Commercial or Financial, or Contains a Trade Secret, or Is Privileged (47 C.F.R. § 0.459(b)(3)).** The Confidential Material includes information regarding international coordination arrangements between Viasat and another satellite operator, the terms of which are sensitive from a commercial and operational perspective and that Viasat keeps strictly confidential. Viasat has a strong business interest in the protection of this sensitive information. Public disclosure of the Confidential Information would place Viasat at a competitive disadvantage vis-à-vis other satellite operators and damage Viasat's position in the marketplace.

4. **Explanation of the Degree to Which the Information Concerns a Service That Is Subject to Competition (47 C.F.R. § 0.459(b)(4)).** The Confidential Material pertains to Viasat's provision of satellite connectivity services, which are subject to vigorous competition from numerous other existing and potential providers.

5. **Explanation of How Disclosure of the Information Could Result in Substantial Competitive Harm (47 C.F.R. § 0.459(b)(5)).** As noted above, a number of providers of satellite connectivity compete or potentially compete with Viasat. If Viasat's competitors were to obtain access to the Confidential Material, they could gain insight into Viasat's sensitive international coordination arrangements and could use such information to improve their competitive positions vis-à-vis Viasat. The resulting commercial advantage to Viasat's competitors could damage Viasat's position in the marketplace.

6. **Identification of Any Measures Taken by the Submitting Party To Prevent Unauthorized Disclosure (47 C.F.R. § 0.459(b)(6)).** The Confidential Material is not normally distributed, circulated, provided, or otherwise available to any party outside of Viasat and the counterparty to the international coordination arrangements at issue, absent agreement to be bound by nondisclosure undertakings.

7. **Identification of Whether the Information Is Available to the Public and the Extent of Any Previous Disclosure of the Information to Third Parties (47 C.F.R. § 0.459(b)(7)).** The Confidential Material is not available to the public and is kept strictly confidential by Viasat. As noted above, third parties that have or need access to the information are bound by nondisclosure undertakings.

8. **Justification of the Period During Which the Submitting Party Asserts That Material Should Not Be Available for Public Disclosure (47 C.F.R. § 0.459(b)(8)).** Viasat requests that the Confidential Material be treated as confidential indefinitely. This period is necessary due to the sensitive nature of the information therein.

9. **Other Information That Viasat Believes May Be Useful in Assessing Whether Its Request for Confidentiality Should Be Granted (47 C.F.R. § 0.459(b)(9)).** The unredacted information contained in the Confidential Request constitutes trade secrets and sensitive commercial information that is "of a kind that would not customarily be released to the public."[2] In addition to treating the Confidential Material as private, Viasat is providing it to the Commission with the understanding that the Commission likewise will treat it as private—which underscores the importance of and basis for preserving confidential treatment going forward.[3] Moreover, the Confidential Material should be withheld from disclosure even if it is deemed to be information compelled to be provided to the Commission, because public disclosure of confidential information in this case would make it difficult for the Commission to obtain reliable information from regulated companies in the future.[4] Courts have recognized that in cases where agencies compel submission of information, there may still be "circumstances in which disclosure could affect the reliability of such data"[5] and thus would result in the diminution of the "reliability" and "quality" of information submitted to the agency.[6] If the type of sensitive information contained in the Confidential Material were publicly disclosed, parties may be less forthcoming and attempt to avoid the provision of more detailed competitive information to the extent possible, which would deprive the Commission of the information that would support well-reasoned decisions regarding how best to serve the public interest.[7]

---

[2] 5 U.S.C. § 552(b)(4).

[3] *See Food Mktg. Inst. v. Argus Leader Media*, 139 S. Ct. 2356, 2361, 2366 (2019).

[4] *See Nat'l Parks & Conservation Ass'n v. Morton*, 498 F.2d 765, 770-71 (D.C. Cir. 1974).

[5] *Critical Mass Energy Project v. NRC*, 975 F.2d 871, 878 (D.C. Cir. 1992) (citing *Wash. Post Co. v. HHS*, 690 F.2d 252, 268-69 (D.C. Cir. 1982)).

[6] *See id*.

[7] *See, e.g.*, *Judicial Watch, Inc. v. Exp.-Imp. Bank*, 108 F. Supp. 2d 19, 29-30 (D.D.C. 2000) ("The government has a compelling interest in ensuring that the information it receives is of the highest quality and reliability, and disclosure of potentially sensitive commercial and financial information, even where submissions of information are mandatory, would jeopardize the [agency's] ability to rely on any such information that is submitted.").

For these reasons, Viasat respectfully requests that the Commission withhold from public inspection, and accord confidential treatment to, the Confidential Material. Please contact the undersigned should you have any questions regarding this submission.

Respectfully submitted,

/s/

Jarrett S. Taubman
VP & Deputy Chief Government Affairs and Regulatory Officer
VIASAT, INC.
901 K Street NW, Suite 400
Washington, DC 20001

cc: Cecilia Tenge-Rietberg, SpaceX

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of	)	ICFS File No.
	)	
Space Exploration Holdings, LLC	)	SAT-LOA-20260108-00016
	)	
For Authority to Launch and Operate the SpaceX Orbital Data Center System	)	

PETITION TO DENY OF VIASAT, INC.

Pursuant to Section 309(d) of the Communications Act, as amended, and Section 25.154(d) of the Commission's rules, Viasat, Inc. petitions to deny[1] the above-captioned application in which Space Exploration Holdings, LLC ("SpaceX") seeks authority to deploy and operate up to *1,000,000 satellites* in low-earth orbit ("LEO") using spectrum in the 18.8-19.3 GHz and 28.6-29.1 GHz portions of the Ka band.[2] This system would be several orders of magnitude larger and more complex than any system that SpaceX has even *proposed* to date, and presents interference and safety issues that reflect this dramatic increase in size and complexity.

As such, there is a pressing need to proceed with caution and carefully evaluate the specific characteristics of the proposed system, and the specific manner in which it would operate. But SpaceX fails to present a concrete proposal that can be meaningfully evaluated by the Commission and third parties, as required by the Commission's rules.[3] Instead, SpaceX provides only a vague description of the system it proposes to operate and asks the Commission

---

1 47 U.S.C. § 309(d); 47 C.F.R. § 25.154. Among other things, Viasat holds authorizations from the Commission in the Ka band—including the portions requested by SpaceX. Viasat therefore has standing to file this petition.

2 *See* ICFS File No. SAT-LOA-20260108-00016, Legal Narrative, at 1 (Jan. 30, 2026) ("SpaceX Application").

3 47 C.F.R. § 25.114(a)(1).

and other operators to *imagine* how the system would look and how it would operate. Indeed, SpaceX describes a system that would include between one and 1,000,000 satellites, distributed in an unspecified manner across an unspecified number of orbital shells nominally positioned at unspecified altitudes within unspecified orbital tolerances, using unspecified hardware. And all of these characteristics would potentially change over time without any notice to or further review by the Commission or the public. SpaceX's approach frustrates any attempt to fully evaluate the potential risks associated with its proposed operations, and thus the Commission's ability to fulfill its public interest mandate.

SpaceX incorrectly suggests that the Commission need not worry about the implications of its proposed system because it would supposedly operate on a "non-interference" basis with respect to other nongeostationary orbit ("NGSO") systems. But SpaceX fails to explain how it would be able to operate on a "non-interference" basis as a practical matter, including with other satellite networks and systems with which SpaceX has coordinated its existing operations. Moreover, SpaceX fails to demonstrate that its efforts to operate on such a basis would be effective under real-world conditions. Such a showing is critical, as the sheer size and scale of SpaceX's proposed operations gives rise to a strong presumption that they would *necessarily* impact other NGSO and geostationary orbit ("GSO") operators in material and adverse ways—including by materially increasing interference risks and risks to space safety and sustainability.

Notably, the Commission has recognized that SpaceX's NGSO operations may *already* pose material risks of this nature. For this reason, the Commission has adopted an "incremental" approach to authorizing additional SpaceX satellites, and has wisely refused to authorize SpaceX to operate more than *15,000* second-generation ("Gen2") Starlink satellites until such time as

these impacts and related risks are better understood.[4] Particularly in light of the Commission's decision to pursue this incremental approach, and deny SpaceX near-term authority to deploy more than 15,000 NGSO satellites in the context of the Gen2 proceeding, it would make little sense for the Commission to grant SpaceX authority to operate up to *1,000,000* additional NGSO satellites in the context of *this* proceeding.

Accordingly, the Commission can, should, and ***must*** deny SpaceX's application.

I. SPACEX'S PROPOSED OPERATIONS WOULD POSE UNACCEPTABLE INTERFERENCE RISKS TO OTHER OPERATIONS IN THE KA BAND

SpaceX attempts to sidestep any meaningful evaluation of the interference risks posed by its proposed operations by suggesting that it is seeking only "limited authority" to conduct "backup operations" in the 18.8-19.3 GHz and 28.6-19.1 GHz band segments.[5] But SpaceX fails to explain how authority to operate a system consisting of *1,000,000* satellites could possibly be characterized as "limited." And SpaceX provides *no* analysis that even *purports* to demonstrate that this proposed system would be able to coexist with other satellite operations in the Ka band.

Instead, SpaceX observes that the 18.8-19.3 GHz and 28.6-19.1 GHz band segments are designated for use by NGSO FSS systems on a primary basis, and asserts that it would "operat[e] on a non-interference, non-protected basis with respect to co-primary" NGSO FSS operations.[6] These conclusory statements are no substitute for analysis demonstrating that SpaceX would, in fact, be capable of operating in this fashion and ensuring that other NGSO and GSO networks and systems do not suffer unacceptable interference. Such analysis is particularly critical given

---

[4] *Space Exploration Holdings, LLC*, 37 FCC Rcd 14882, at ¶ 19 (2022); *Space Exploration Holdings, LLC*, DA 26-36, at ¶ 5 & n.9 (Jan. 9, 2026).

[5] SpaceX Application, Technical Supplement, at A-4.

[6] *Id.*

SpaceX's failure to acknowledge, let alone address, obvious interference risks that would be presented by its proposed operations with respect to both NGSO and GSO operations.

A. SpaceX's Proposed Operations Would Pose Unacceptable Interference Risks to Other NGSO Systems

Viasat has previously demonstrated that the operation of a relatively small number of SpaceX's Starlink satellites in LEO would create an extremely large number of in-line interference events between Starlink and other NGSO systems operating in the Ka band.[7] As Viasat explained, SpaceX's satellites are able to block other systems from using otherwise available "look angles," reducing the spectrum and capacity available to those NGSO systems. These adverse impacts are particularly severe in the case of smaller NGSO systems. In stark contrast, SpaceX is *not* adversely impacted by such in-line interference events given the number of satellites it has at its disposal.[8]

SpaceX's proposed operations would pose similar risks to other NGSO systems operating in the Ka band, albeit at a much larger scale. Indeed, SpaceX proposes to operate up to *1,000,000* additional satellites, which would increase the number of satellites it operates in LEO by a factor of about *67*. Each of the *1,000,000* proposed satellites would be a potential source of harmful interference, and would likely generate a substantial number of in-line interference events. And with that many satellites operating—particularly within a complex orbital configuration that SpaceX does not adequately describe in its application[9]—it is highly unlikely

---

[7] *See, e.g.*, Petition to Deny or Hold in Abeyance of Viasat, Inc., ICFS File No. SAT-LOA-20200526-00055 *et al*., at 4-9 (Feb. 8, 2022); Petition to Deny or Hold in Abeyance of Viasat, Inc., ICFS File No. SAT-LOA-20200526-00055 *et al*., at 16-19 (Mar. 10, 2025).

[8] *Id.*

[9] *See supra* pp. 1-2.

that SpaceX would be able to fully protect other NGSO operators or live up to its commitment to operate on a "non-interference" basis.

There is particular cause for concern as SpaceX has made no effort to explain how it would be capable of operating on a "non-interference" basis. Among other things:

- SpaceX does not explain how it would define "harmful" interference and what threshold(s) it would use to "activate" interference mitigation mechanisms;
- SpaceX does not explain how it would identify other satellite facilities that may be impacted by its proposed operations to ensure they are adequately protected;
- SpaceX does not explain whether and how it would distinguish between interference caused by its proposed data center operations and interference caused by Starlink, including in determining whether impacts on other satellite operators are "harmful";
- SpaceX does not explain what specific mechanisms it would use to mitigate potential and actual interference to other operators, and does not demonstrate that such measures would prove effective under real-world conditions;
- SpaceX does not explain how these measures could be implemented without undermining the intended function of each satellite—namely, to provide uninterrupted and on-demand access to data;
- SpaceX does not explain how it would ensure that other satellite operators could trace any interference to SpaceX and distinguish between interference caused by its proposed data center satellites and interference caused by Starlink operations;
- SpaceX does not explain why its commitment to operate on a "non-interference" basis would be meaningful given that it could leverage its bargaining power in other areas (*e.g.*, launch capacity) to compel other NGSO operators to accept interference from such operations *notwithstanding* such commitment;[10] and
- SpaceX does not explain which NGSO FSS operators it would treat as "co-primary" and deserving of protection—a non-trivial question.

---

[10] *See* Micah Maidenberg, *Elon Musk's SpaceX Now Has a 'De Facto' Monopoly on Rocket Launches*, WALL STREET J. (July 7, 2023), https://www.wsj.com/articles/elon-musks-spacex-now-has-a-de-facto-monopoly-on-rocket-launches-3c34f02e; Emily Glazer, Dana Mattioli, & Micah Maidenberg, *SpaceX Wields Power Over Satellite Rivals to Boost Starlink*, WALL STREET J. (Oct. 9, 2024), https://www.wsj.com/business/telecom/spacex-wields-dominance-in-rocket-launches-to-boost-starlink-fde71f17?mod=mhp.

SpaceX more generally fails to acknowledge that its proposed operations would place substantial burdens on other operators, even if SpaceX nominally operates on a "non-interference" basis. Among other things, those operators would need to actively monitor *billions* of interactions with SpaceX satellites to ensure that they do not generate unacceptable levels of interference. Likewise, the Commission would be compelled to devote resources to monitoring SpaceX, enforcing any "non-interference" conditions, and adjudicating inevitable disputes with other operators. SpaceX does not address *any* of these issues.

In short, SpaceX's proposal raises substantial, material, and unresolved questions with respect to its ability to operate on a "non-interference" basis as claimed.

B. SpaceX's Proposed Operations Would Pose Unacceptable Interference Risks to GSO Networks

As noted above, SpaceX proposes to operate up to *1,000,000* additional satellites in the 18.8-19.3 GHz and 28.6-29.1 GHz portions of the Ka band. In designating those band segments as primary for NGSO FSS operations, the Commission was careful to explain that this designation applied only within the United States, and between U.S.-licensed operators outside of the United States. The Commission further explained that NGSO operators must conduct their operations *within* the United States in a manner consistent with their obligations to protect GSO operations *outside* of the United States. As the Commission made clear, "ITU coordination requirements will continue to apply between filings of different administrations, which in turn may limit NGSO FSS operations in the United States . . . ."[11]

Thus, SpaceX is required to protect non-U.S.-licensed GSO operators outside of the United States where NGSO systems do *not* have priority in the 18.8-19.3 GHz and 28.6-29.1

---

[11] *Update to Parts 2 and 25 Concerning Non-Geostationary, Fixed-Satellite Service Systems and Related Matters*, 32 FCC Rcd 7809, at ¶ 14 (2017).

GHz band segments. SpaceX also is bound to protect GSO operations inside the United States in accordance with the terms of coordination to which SpaceX has agreed.

SpaceX makes *no* attempt to demonstrate that it would be able to protect GSO operations outside of the United States. Nor does it expressly commit to operate on a "non-interference, non-protected" basis with respect to such GSO operations—were such a thing even possible.[12]

SpaceX ignores that its proposed operations would be inconsistent with its obligations under international coordination agreements governing its use of the 18.8-19.3 GHz and 28.6-29.1 GHz band segments globally—including in the United States. For example, SpaceX has entered into a series of international coordination arrangements with Viasat (copies of which have been submitted to the Commission previously), under which SpaceX has committed to {{BEGN CONFIDENTIAL}} [redacted] {{END CONFIDENTIAL}}[13] SpaceX does not demonstrate how its proposed operations would be consistent with these commitments.

II. SPACEX'S PROPOSED OPERATIONS WOULD POSE UNACCEPTABLE SAFETY AND SUSTAINABILITY RISKS

As Viasat has explained previously, the risks to space safety and sustainability posed by NGSO constellations—including but not limited to collision risk and human casualty risk—are

---

[12] SpaceX attempts to limit that commitment to NGSO FSS operations only. *See* SpaceX Application, Technical Supplement, at A-4. It is unclear whether SpaceX can opt into secondary status on a selective basis in this fashion.

[13] *See* Coordination Agreements attached to Letter from Viasat to FCC, ICFS File No. SAT-PPL-20211207-00173 *et al*. (June 23, 2023).

aggregate risks that scale with constellation size.[14] As such, the risks associated with SpaceX's proposed operations would accumulate across the up to *1,000,000* satellites that it proposes to operate in LEO. But SpaceX ignores this basic point, and instead treats each of its proposed satellites as if it would operate in isolation. As a result, SpaceX materially underestimates the risks to space safety and sustainability posed by its proposed operations.

This issue is compounded by SpaceX's decision to design its system to satisfy limits developed for use with much smaller NGSO systems. Applying those limits to SpaceX's proposed 1,000,000-satellite system would permit operations that are manifestly irresponsible and inconsistent with the public interest. For example:

- SpaceX asserts that it would "assess and limit the probability of collision between its satellites and other large objects to ensure it remains below 0.001 during all mission phases."[15] Applying a 0.001 probability across 1,000,000 satellites suggests that 1,000 collisions would occur—a result that would be devastating for ongoing access to and use of space and clearly incompatible with the public interest.

- SpaceX asserts that it would "make every effort to minimize the probability that its satellites will become a source of debris by collisions with small debris or meteoroids" such that "[s]atellites in the system will exhibit a probability below 0.01 . . . ."[16] Applying a 0.01 probability across 1,000,000 satellites suggests that 10,000 satellites would become a source of debris following collision with small objects—again, a result that would be devastating for ongoing access to and use of space and clearly incompatible with the public interest.

- SpaceX asserts that it "will show . . . that the human casualty risk" associated with its proposed operations "is < 1e-4."[17] Applying a 1e-4 (or 0.0001) probability across 1,000,000 satellites suggests that 100 human casualties would occur—an unacceptable result that is, once again, clearly incompatible with the public interest.

---

[14] *See, e.g.*, Comments of Viasat, Inc., IB Docket No. 18-313 (Jun. 27, 2024).

[15] SpaceX Application, Technical Supplement, at A-8.

[16] *Id.* at A-9.

[17] *Id.* at A-14.

In short, SpaceX's orbital debris plan does *not* demonstrate that it would effectively mitigate the safety and sustainability risks posed by its proposed operations, as required by the Commission's rules.[18] Critically, while those rules discuss certain probability thresholds, those thresholds are *not* safe harbors, and it may be necessary for an operator to operate within more restrictive limits where necessary to safeguard the public interest. That is the case here given the size and scale of SpaceX's proposed operations.[19]

For similar reasons, the 100 object-year limit imposed on Gen2 operations would be even less adequate if imposed on the operations proposed by SpaceX in this proceeding. Under that limit, SpaceX must cease deploying satellites if it experiences satellite failures amounting to more than 100 post-failure object-years.[20] To illustrate the inadequacy of such a limit in the context of this proceeding, note that a SpaceX satellite experiencing a failure or collision resulting in loss of maneuverability would be incapable of performing a post-mission disposal maneuver, and that non-maneuverable satellites above 700 km would likely remain in orbit for centuries. Under this scenario, the 100 object-year limit would be exceeded by a single satellite losing maneuverability. This represents *0.0001 percent* of the total satellites that SpaceX seeks authority to deploy. It is likely that SpaceX's proposed data center satellites would fail at a much higher rate based on SpaceX's historical failure rates.

---

[18] 47 C.F.R. § 25.114(d)(14).

[19] Certainly, there is no basis for SpaceX to *relax* the standards that it currently applies to its smaller (but still unnecessarily large) Starlink system. SpaceX asserts that its proposed system would "mitigate[] conjunctions with collision probability above a maximum of 1e-5 with mitigation target at 1e-6 or lower." SpaceX Application, Technical Supplement, at A-9. Notably, SpaceX has explained that it mitigates Starlink conjunctions to a collision probability of 3e-7. *See* Letter from SpaceX to FCC, ICFS File No. SAT-LOA-20200526-00055 *et al*., at 3 (Dec. 31, 2025). SpaceX does not explain why 3e-7 is required for Starlink but 1e-5 is somehow adequate for its proposed system of 1,000,000 satellites.

[20] *Space Exploration Holdings, LLC*, 37 FCC Rcd 14882, at ¶ 135.z (2022).

The size and scale of SpaceX's proposed operations also provide reason to question whether certain simplifying assumptions used by the Commission would or could remain valid in the case of the operations now proposed by SpaceX. For example, SpaceX asserts that the "collision risk for active satellites in the system may be assumed to be zero" because SpaceX would use active collision avoidance.[21] But as NASA has demonstrated, this assumption is untenable in the case of large NGSO systems due to the "residual risks" that accumulate across those systems.[22] Such an assumption would be particularly untenable in the case of a new SpaceX system consisting of up to 1,000,000 satellites operating in LEO.[23]

* * * * *

For the reasons set forth above, the Commission cannot, should not, and ***must not*** grant SpaceX's application.

Respectfully submitted,

/s/
Jarrett S. Taubman
VP & Deputy Chief Government Affairs and Regulatory Officer
VIASAT, INC.
901 K Street NW, Suite 400
Washington, DC 20001

March 6, 2026

---

[21] SpaceX Application, Technical Supplement at A-9.

[22] *See* Comments of the Nat'l Aeronautics & Space Admin., IB Docket No. 18-313, at 2-3 (Oct. 30, 2020).

[23] Similarly, SpaceX suggests that it would rely on the 18th Space Defense Squadron ("SDS") to facilitate space situational awareness. *See* SpaceX Application, Technical Supplement at A-6. It is unclear if the 18th SDS has the capacity to effectively track *1,000,000* additional space objects and provide real-time conjunction warnings where appropriate.

CERTIFICATE OF SERVICE

I, Bradley Bourne, hereby certify that on this 6th day of March, 2026, I caused to be served a true copy of the foregoing Petition to Deny of Viasat, Inc. via first-class mail upon the following:

Cecilia Tenge-Rietberg
Sr. Satellite Policy Manager
SPACE EXPLORATION TECHNOLOGIES CORP.
1 Rocket Road
Hawthorne, CA 90250

/s/ *Bradley Bourne*
Bradley Bourne