

Exhibit A

Technical Analysis

Viasat submits the following showing to demonstrate that the proposed gateway-type earth station, or satellite access node (“SAN”), located in Marion County, OR, is compatible with Upper Microwave Flexible Use Service (“UMFUS”) operations in accordance with Section 25.136(a)(4) and therefore should be authorized with the rights and protections afforded by Section 25.136(a).

The Viasat SAN antenna is configured to operate with the ViaSat-3-class satellite at 88.9 W.L., and this configuration provides the relevant operational azimuth and elevation angles. The antenna parameters used in the analysis are identified in the FCC Form 312 application and supporting exhibits and reflect measured gain patterns for the proposed earth station antenna.

A. Computation of pfd Contour

In most cases, terrain and objects on the Earth’s surface provide for additional attenuation of the signal emitted from the earth station antenna in the direction of the horizon around the earth station over and above the expected free space and atmospheric attenuation. The additional attenuation of the radio frequency signal from terrain and surface features further reduces the power flux density (pfd) of the region around the SAN antenna.

To determine whether terrain or surface obstructions around the SAN antenna would provide any further reduction of the pfd at a 10 meter reference height, an analysis was performed using Recommendation ITU-R P.452.¹ Recommendation P.452, Prediction procedure for the evaluation of interference between stations on the surface of the Earth at frequencies above about 100 MHz, provides a propagation model and methodology for computing signal attenuation based on input parameters. In the computation of the contour, the attenuation above free space in the vicinity of the earth station is strongly driven by terrain and surface features rather than by atmospheric effects. To accurately predict the expected attenuation, LIDAR surface data with 1 meter resolution from Intermap was used to provide both clutter height and terrain information.

The computation of the contour around the antenna used the nominal input power density to the SAN antenna along with measured antenna gain information to determine the e.i.r.p. density along a particular azimuth. Next, path and clutter/terrain losses were taken into consideration for all the locations around a SAN site along with polarization discrimination to determine which blocks around the SAN site exceed the -77.6 dB(mW/(m² * MHz)) limit at the 10 meter reference height.

¹ In previous applications submitted in accordance with Section 25.136 of the Commission’s rules, Viasat utilized the NTIA Irregular Terrain Model (“ITM”) —an approach that the Commission has approved, and which also could have been used in the case of the instant application with similar results.

Finally, once the analysis is completed, a GIS shape file of the resulting contour is created for import into Viasat's ArcGIS tool and can be examined with respect to population and other elements of Section 25.136. An illustration of the contour is included below as Figure 1, and is also included in a .kmz file attached separately in ICFS.

B. Satisfaction of Section 25.136 Criteria

a. Section 25.136(a)(4)(i)

The earth station location is in Marion County, OR. A search of the ICFS database indicates that there are no other earth stations licensed in the 27.5-28.35 GHz band segment in that county.

Therefore, the earth station satisfies the requirement in Section 25.136(a)(4)(i) that there be no more than two other earth stations operating or authorized to operate in the 27.5-28.35 GHz band within the county on a protected basis under Section 25.136.

b. Section 25.136(a)(4)(ii)

The total population covered by the $-77.6 \text{ dB(mW/(m}^2 * \text{ MHz))}$ contour is below the applicable threshold specified in Section 25.136(a)(4)(ii).

Overlaying the $-77.6 \text{ dB(mW/(m}^2 * \text{ MHz))}$ contour on a map depicting census blocks, Viasat has calculated an estimate of the population covered by the contour using 2020 census data and assuming that the population coverage within a partially covered census block is equal to the percentage of the geographic area of the census block covered by the contour.² Figure 1 below contains a diagram depicting the contour overlaid on a census block map.

² This approach to estimating population coverage using the most recently available decennial census block data and the actual area method is consistent with the recommended approach in the Commission's updated guidance regarding earth station siting. *See Space Bureau Updates its Guidance on Siting Methodologies for Earth Stations Seeking to Operate in the 24.75-25.25 GHz, 27.5-28.35 GHz, 37.5-40 GHz, 47.2-48.2 GHz, and 50.4-51.4 GHz Bands to Demonstrate Compliance with Section 25.136*, DA 25-206 (rel. Mar. 10, 2025) ("2025 Siting Guidance").



Figure 1 – Salem, OR SAN -77.6 dB(mW/(m2 * MHz)) pfd contour

The population of Marion County is 345920, and thus the applicable population limit under Section 25.136(a)(4)(ii) is 450.

The following identifies the census block, population and the population coverage estimate as determined by the actual area method currently on file for this earth station.

Census Block Number	Total Population of Census Block	Population Coverage Estimate	Percent of Block Covered by Pattern
410470005011017	0	0	9.18%
Total Estimated Population Coverage:		0	

Table 2 – Population Coverage Overview

The total estimated population covered by the contour thus is below the applicable population limit.

c. Section 25.136(a)(4)(iii)

The -77.6 dB(mW/(m² * MHz)) contour does not contain any major event venue, urban mass transit route, passenger railroad, or cruise ship port, or any road identified as an Interstate, Other Freeway and Expressway, or Other Principal Arterial road in the Federal Highway Administration Office of Planning, Environment, and Realty Executive Geographic Information System map.³

d. Section 25.136(a)(4)(iv)

As required under Section 25.136(a)(4)(iv) and Section 101.103 of the Commission's rules, Viasat initiated coordination with terrestrial licensees within the area covered by the -77.6 dB(mW/(m² * MHz)) contour with respect to existing facilities constructed and in operation by the UMFUS licensees. The Prior Coordination Notice ("PCN") was sent by Comsearch on January 12, 2026. The Comsearch coordination report is attached as Exhibit C.

On February 5, 2026, Viasat received a response from Verizon. Although Verizon characterized its response as an "objection," Verizon failed to provide a technical basis for such "objection," and more specifically failed to include technical information supporting its position as required under Section 101.103(d)(2)(iv) of the Commission's rules. Instead, Verizon merely noted the location of various Verizon facilities operating within the 28 GHz band and in the general vicinity of the proposed Viasat earth station.⁴

Notwithstanding Verizon's failure to satisfy the clear requirements of Section 101.103(d)(2)(iv), Viasat reviewed the locations identified by Verizon and confirmed that none of the identified sites fell within the -77.6 dBm/m2/MHz PFD contour for the proposed earth station. Viasat asked Verizon to provide more detailed technical information to explain the nature of its concerns.

On February 11, 2026, Verizon responded and claimed that Viasat's earth station would cause interference to Verizon because it "uses a PFD signal interference threshold of -

³ See Federal Highway Administration, Office of Planning, Environment, and Realty Executive Geographic Information System Map, available at <https://hepgis-usdot.hub.arcgis.com/>; see also *Use of Spectrum Bands Above 24 GHz for Mobile Radio Services*, Second Report and Order, 32 FCC Rcd 10988, App'x B (2017) ("[T]he roads listed in the revision to Section 25.136 . . . can readily be identified by consulting the Federal Highway Administration (FHWA) Office of Planning, Environment, and Realty Executive Geographic Information System (HEPGIS) map HEPGIS allows the user to enter any street address in the U.S. and display an interactive map with a legend that identifies road classifications as they are defined by the Department of Transportation at 23 C.F.R. Section 470.105 pursuant to 23 U.S.C. Sections 101 and 103."); 47 C.F.R. § 25.136(a)(4)(iii).

⁴ Certain information provided by Verizon during coordination is redacted in the public version of this Exhibit A.

118.6 dBW/m²/MHz (-88.6 dBmW/m²/MHz) for Verizon 28GHz network deployments” such that Viasat’s proposed earth station would allegedly “fail coexistence.” Critically, Verizon did not allege or demonstrate that Viasat’s operations would result in an exceedance of the applicable -77.6 dBmW/m²/MHz interference threshold specified in the Commission’s rules—i.e., Verizon in no way demonstrated that Viasat had caused *cognizable, harmful* interference.

Verizon has provided *no* justification for its attempts to apply a bespoke -88.6 dBmW/m²/MHz threshold that is inconsistent with the Commission’s framework for coexistence between terrestrial and satellite operations in the 27.5-28.35 GHz band. Under the plain language of Section 25.136(a)(4)(iv), an earth station applicant must complete frequency coordination with “the UMFUS licensees within the area in which the earth station generates a PFD, at 10 meters above ground level, of greater than or equal to -77.6 dBmW/m²/MHz with respect to existing facilities constructed and in operation by the UMFUS licensee.” But Verizon bases its “analysis” on a threshold that is 11 dB more stringent than what is required by Section 25.136.⁵ This is inherently unreasonable and the Commission should reject Verizon’s collateral attack on the longstanding coexistence framework embodied in Section 25.136.

Critically, if the *proper* interference threshold is used, there is no overlap of Viasat’s contours with Verizon’s fixed locations. This is illustrated in Figure 3 below, in which Viasat plotted the relevant Verizon 28 GHz network locations on a satellite image with the -77.6 dBmW/m²/MHz PFD contour for Viasat’s earth station:

⁵ Notably, the Commission adopted the -77.6 dBm/m²/MHz threshold in the *Spectrum Frontiers* proceeding after developing a substantial record with input from both satellite and terrestrial interests. Allowing Verizon to circumvent the resulting framework by establishing an arbitrarily low protection threshold for coordination would render the -77.6 dBm/m²/MHz threshold meaningless and eviscerate the carefully considered rules adopted in *Spectrum Frontiers*.



Figure 3 - Salem, OR SAN -77.6 dB(mW/(m2 * MHz)) pfd contour and Verizon BS in Yellow Pins.

As seen in Figure 3 there is no overlap between the PFD contours and the sites identified by Verizon during coordination.

In short, Viasat has made every effort to complete coordination of the proposed earth station. In stark contrast, Verizon has failed to coordinate in good faith. The Commission should not countenance Verizon's obstructionist efforts and should instead find that Viasat has satisfied its coordination obligations with respect to the proposed site.