



March 8, 2018

BY ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

**Re: *Spectrum Bands Above 24 GHz et al.*, GN Docket No. 14-177, IB Docket No. 15-256,
 WT Docket No. 10-112, and IB Docket No. 97-95**

***Update to Parts 2 and 25 Concerning Non-geostationary, Fixed-Satellite Service
Systems and Related Matters, IB Docket No. 16-408***

***Amendment of Parts 2 and 25 of the Commission's Rules to Facilitate the Use of Earth
Stations in Motion Communicating with Geostationary Orbit Space Stations in
Frequency Bands Allocated to the Fixed Satellite Service, IB Docket No. 17-95***

Spectrum Horizons, ET Docket 18-21

Dear Ms. Dortch:

On March 7, 2018, Hughes Network Systems, LLC, represented by Jennifer Manner, Senior Vice President, Regulatory Affairs, and Brennan Price, Senior Principal Engineer, Regulatory Affairs, met with staff of the International Bureau to discuss various issues in the above captioned proceedings.

International Bureau staff present in person were Jose Albuquerque, Karl Kensinger, and Stephen Duall. Kal Krautkramer of the International Bureau staff joined the meeting by telephone.

During the meeting, Hughes briefed attendees of company positions on the following issues:

Domestic Coverage Notice for NGSO Systems (Petition for Reconsideration in IB Docket 15-526): Hughes opposes the FCC lifting the domestic coverage requirements for non-geostationary orbit satellites. Such an approach will open the door to operators' cherry-picking lucrative service areas, likely at the expense of broadband access to users in more sparsely populated areas of the country.

Spectrum Frontiers (Second Further Notice of Proposed Rulemaking in GN Docket 14-177, IB Docket 15-256, WT Docket 10-112, and IB Docket 97-95): Hughes supports the further proposed rulemaking to permit individually licensed FSS earth stations in the 24.75-25.25 GHz band. Enabling such

access will increase flexibility of operators to expand future FSS network designs to select uplink frequencies that meet satellite broadband customer needs and avoid impact on terrestrial networks in other bands.

Spectrum Horizons (Proposed Rulemaking in ET Docket 18-21): In the bands above 95 GHz, the fixed satellite service will be able to share on a limited basis with terrestrial wireless. To this end, the FCC has proposed allowing satellite gateway use in a limited manner as was adopted in Spectrum Frontiers in the 27.5-28.35 and 47.2-48.2 GHz bands. While this approach may have made sense for these lower bands, there is no reason to impose such severe limitations on these upper bands where neither the satellite nor terrestrial technology is available. Instead, the FCC should defer action on sharing rules until both the satellite and terrestrial technologies are further developed. The development of advanced sharing technologies may incubate alongside higher frequency technologies and predetermining sharing rules before there is a technology to effectively use these bands may discourage its development.

Earth Stations in Motion (Proposed Rulemaking in IB Docket 17-95): Hughes continues to support the use of the Ka band for ESIMs. Such use, however, must ensure that there is adequate interference-free use of the spectrum for traditional FSS as well. Accordingly, we support the implementation of off-axis e.i.r.p. density limits as a substitute for antenna pointing requirements.

Pursuant to the Commission's rules, this notice is being filed in the above-referenced dockets for inclusion in the public record. Please contact me should you have any questions.

Respectfully submitted,

/s/ *Brennan T. Price*

Brennan Price
Senior Principal Engineer, Regulatory Affairs
Hughes Network Systems, LLC
11717 Exploration Lane
Germantown, MD 20876
(301) 428-1654

Cc: Jose Albuquerque
Stephen Duall
Karl Kensinger
Kal Krautkramer