



September 25, 2019

Via ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Subject: *Revised Mean Opinion Score Testing per Order on Reconsideration
(WC Docket No. 10-90)*

Dear Ms. Dortch:

On September 12, 2019, the Commission staff released an Order on Reconsideration in this docket modifying the Mean Opinion Score ("MOS") testing regime applicable to high-latency bidders in Commission competitive awards of universal service support.¹ Among other things, the *MOS Reconsideration Order* retained a requirement for providers to perform conversational tests to determine MOS scores but modified the testing requirements.²

Hughes Network Systems, LLC ("Hughes") has previously expressed concerns that the original MOS testing framework adopted by the Bureaus might not be achievable by satellite broadband providers using geostationary satellites.³ Hughes has reviewed the modified requirements delineated in the *MOS Reconsideration Order*. Based on its review, Hughes believes it can meet these requirements.

Please direct any questions regarding this filing to the undersigned.

Sincerely,

/s/

Jennifer A. Manner
Senior Vice President, Regulatory Affairs

cc: Suzanne Yelen
Alexander Minard

¹ *Connect America Fund*, Order on Reconsideration, DA 19-911 (WCB WTB OET rel. Sept. 12, 2019) ("*MOS Reconsideration Order*").

² See *id.* at ¶¶ 19-22.

³ See *id.* at ¶ 15.