



November 13, 2017

BY ELECTRONIC FILING

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

Re: Modernizing the FCC Form 477 Data Program, WC Docket No. 11-10.

Dear Ms. Dortch,

Following a request from the Federal Communications Commission ("Commission") staff at a recent meeting,¹ Hughes Network Systems, LLC ("Hughes") submits this ex parte, supplementing its earlier positions filed in the above-referenced proceeding.²

Hughes continues in its reservations regarding full release of disaggregated subscriber data, however, given the benefits to policymakers and academics, and Hughes's own experience in providing limited access to subscriber data under non-disclosure agreements, Hughes supports the Commission allowing the release of disaggregated subscriber data once a commercially reasonable period of time - five years - has elapsed and limited in granularity. The five year holding period is reasonable to minimize the commercial sensitivities that exist in a limited participant marketplace, as articulated in our comments.³ However, disaggregation should be limited to the size of the original reporting blocks, ensuring that no more detail is revealed beyond the sample census block level that the reporting entity had originally reported on in its Form 477 submission.

Hughes supports the Commission in its efforts to modernize and streamline the Form 477 data collection. Permitting the release of disaggregated subscriber data after a period of five years align with the Commission objectives for ensuring a well-informed decision-maker, while balancing the needs of service providers to protect commercially sensitive subscriber data.

Please contact the undersigned if you have any questions.

Respectfully submitted,

/s/ Jennifer A. Manner

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¹ See Hughes Ex Parte in WC Docket No. 11-10 filed November 2, 2017.

² See Hughes Comments in WC Docket No. 11-10 filed October 10, 2017.

³ Hughes Comments in WC Docket No. 11-10 filed October 10, 2017.

/s/ Jodi Goldberg

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