November 10, 2014

REDACTED FOR PUBLIC INSPECTION

Via Hand Delivery
Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Latency Standards for Participation in High-Cost Support Mecahnisms (WC Docket No. 10-90; WT Docket No. 10-208; WC Docket No. 14-58; WC Docket No. 07-135; CC Docket No. 01-92): Follow up on Hughes Network's Satellite Broadband Service

Dear Ms. Dortch:

This letter provides additional information on Hughes Network Systems (Hughes) broadband services and a proposed alternative to a latency ceiling as a qualification for participation in high-cost universal service program, including the Connect America Fund (CAF) Phase II. As demonstrated herein, Hughes is providing a very attractive, cost-effective, nationwide advanced broadband service to U.S. consumers, as are other satellite broadband providers. Further, consumers are taking a variety of different satellite broadband packages based on their needs including in many markets where there are choices such as terrestrial wireline and wireless, where different speeds and latencies are available.

In order to enable the FCC to adopt a regime for CAF funding that is technology neutral and provides consumers with the greatest service choices, Hughes continues to urge the FCC not to adopt unnecessary qualification requirements. However, if the FCC does determine that adoption of latency qualification requirements is required, Hughes proposes below an alternative latency standard that is instead focused on the user experience.

I. Hughes Broadband Services

Hughes today offers advanced broadband services throughout North America to over one million consumers utilizing its broadband satellite network. As demand for satellite broadband services continues to increase and the technology continues to evolve to provide an even greater consumer broadband experience, Hughes will be launching an even more advanced high throughput satellite in 2016 which will bring advanced services and higher speed internet services to United States consumers.

A. Hughes Broadband Service Plans

As discussed, Hughes broadband services plan are competitive in the broadband marketplace and offer a variety of pricing plans at different speeds with different data amounts, based on consumer needs. Our current plans and pricing are available at: http://www.hughesnet.com/?page=Plans-Pricing). Some of our most popular plans include:

Plan	Data Rates (Mbps)	Monthly Charge	Data Cap
Connect	5/1	$49.99	10 Gb
Power	10/1	$59.99	20 Gb
Power Pro	10/2	$79.99	30 Gb
Power Max	15/2	$129.99	40 Gb

A growing new service that Hughes is offering is its VoIP service which is generally priced at $29.95 month for unlimited domestic calling.

The Connect plan (5/1) is available throughout the contiguous United States. The attached map (Annex A), shows where the full range of services are available. In 2016, after the launch of Hughes' new satellite, EchoStar XIX, services will be expanded **[CONFIDENTIAL MATERIAL REDACTED]**.

The figure below shows the percentage of Hughes customers that select each tier of service that Hughes provides. As demonstrated below, many customers choose a middle tier of service that enables a 10/1 Mbps service, with reasonable data limits, at a very reasonable price point.

Plan	Data Rates (Mbps)	Distribution
Connect	5/1	CONFIDENTIAL
Power	10/1	CONFIDENTIAL
Power Pro	10/2	CONFIDENTIAL
Power Max	15/2	CONFIDENTIAL

B. Gateway Locations

As discussed with FCC staff, Hughes has a number of gateway locations (See Annex B). Hughes selects each location after a thorough analysis which includes their proximity to fiber optic access points, minimizing transit time for broadband and voice traffic to reach its destination and local rain statistics. Because of such an analysis, Hughes has located its gateway stations in a manner that positions its broadband network to perform optimally, minimizing latency and ensuring its consumers have the best consumer broadband experience possible.

E. A Proposal for Latency Standards for Participants in the CAF Phase II Competitive Bidding Process

In order to make sure that consumers who participate in the USF program, have access to the widest number of consumer broadband choices, Hughes is providing this alternative latency standard for CAF qualification. Specifically, Hughes proposes that the FCC adopt a "loading time" standard based on a standardized test of average loading time of certain popular web pages. In order to ensure that standardized results are met, Hughes proposes the adoption of the current testing methodology used by SamKnows as part of the Commission's broadband testing program.[1] Hughes recommends that the FCC issue a public notice seeking comments on an acceptable threshold for this test procedure. Another

[1] FCC's "Measuring Broadband America" Program, see http://www.fcc.gov/measuring-broadband-america

option is for the FCC to allow operators seeking to participate in CAF to choose to meet either the loading time standard or the FCC's proposed 100 ms latency standard. Such flexibility will maximize efficiency in the CAF and ensure that consumers are able to obtain the widest variety of broadband services so that they can best meet their requirements based on quality and price.

Sincerely,

Jennifer A. Manner

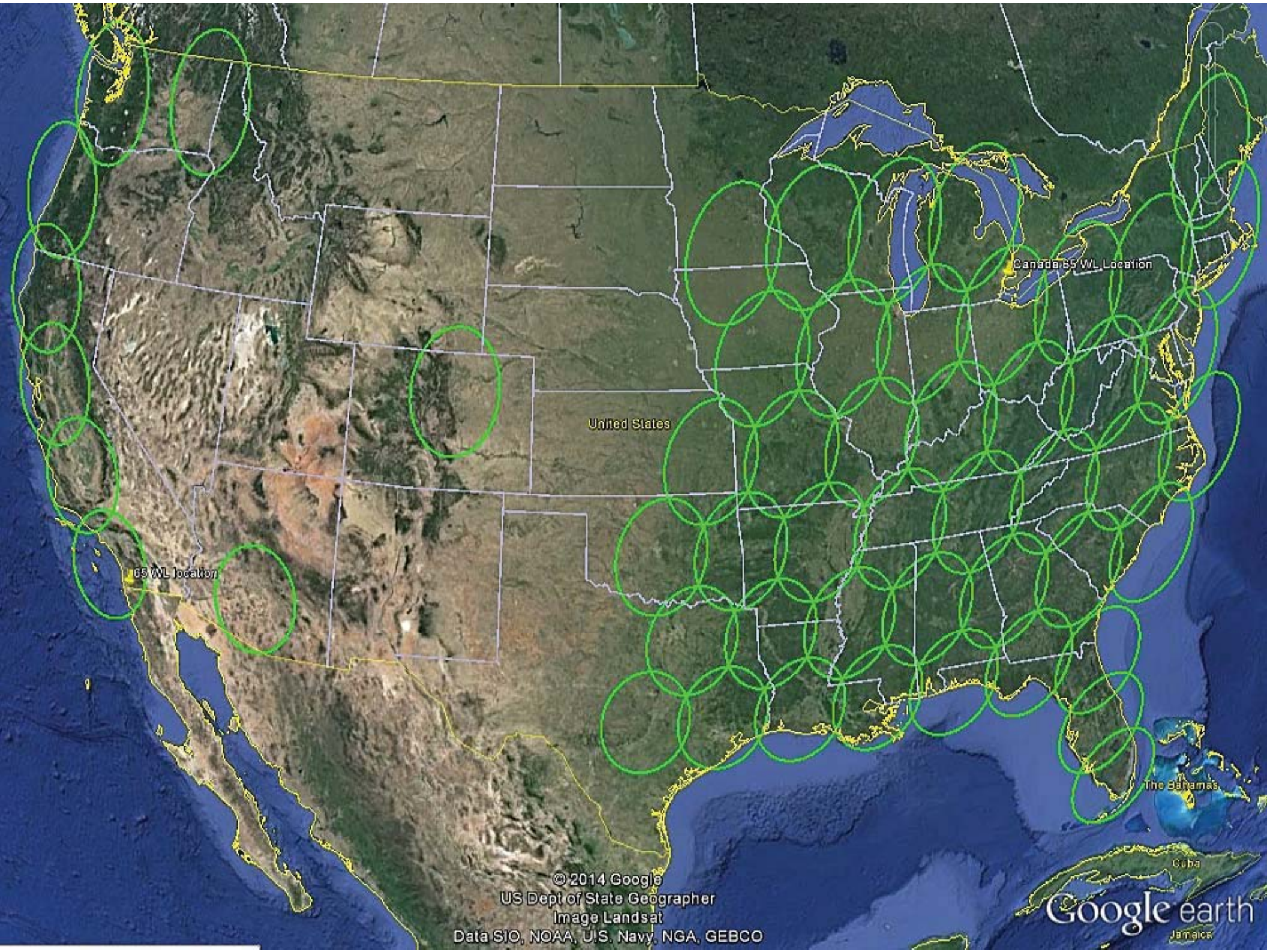
Attachments

cc (hand delivery):

Rodger Woock
Alexander Minard
Suzanne Yelen
Alec MacDonell
Christopher Cook
Lisa Gelb
Randy Clarke
Denise Coca
Pamela Megna
Jonathan Reel
John Visclosky

Annex A: Map of NextGen, High-Bandwidth Coverage

(Note: 5/1 coverage is available nationwide)


Canada 65 WL Location
United States
65 WL location
The Bahamas
Cuba
Jamaica
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Annex B: Gateway Locations

Albuquerque, New Mexico
Amarillo, Texas
Billings, Montana
Boise, Idaho
Del Rio, Texas
El Paso, Texas
Englewood, Colorado
Flagstaff, Arizona
Grand Junction, Colorado
Missoula, Montana
North Platte, Nebraska
Odessa, Texas
Rapid City, South Dakota
Salt Lake City, Utah
Tucson, Arizona