



April 20, 2015

**VIA ECFS**

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

Re: Ensuring Customer Premises Equipment Backup Power for Continuity of Communications, PS Dkt No. 14-174; Technology Transitions, GN Dkt No. 13-5; Policies and Rules Governing Retirement of Copper Loops by Incumbent Local Exchange Carriers, RM-11358; Special Access for Price Cap Local Exchange Carriers, WV Dkt No. 05-25; AT&T Corporation Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services, RM-10593 - *Ex Parte Notice*

Dear Ms. Dortch:

Pursuant to Section 1.1206 of the Federal Communications Commission's ("Commission") rules, 47 C.F.R. § 1.1206, Hughes Network Systems, LLC ("Hughes") submits this letter summarizing a meeting on April 16, 2015 regarding the above-referenced proceedings. Present at the meeting on behalf of Hughes were: Jennifer A. Manner, Vice President, Regulatory Affairs; Jesse T. Jachman, Senior Counsel, Regulatory Affairs; Michael Middeke, Senior Product Line Director; Emanuel Harrington, Senior Technical Director; and Andrew J. Street, Legal Intern, Regulatory Affairs. Attending the meeting on behalf of the Commission were: Chuck Needy, Senior Economist, Office of Strategic Planning & Policy Analysis; Lauren Kravetz, Deputy Chief, Public Safety Homeland Security Bureau ("PSHSB"), Cybersecurity and Communications Reliability Division ("CCR"); John Healy, Associate Chief, PSHSB, CCR; Linda Pinto, Senior Legal Advisor, PSHSB; Jerry Stanshine, Telecom Systems Specialist, PSHSB, and Anne Citrenbaum, Intern, PSHSB.

During the meeting Hughes discussed points raised in its reply comments filed in the above proceedings.<sup>1</sup> Specifically, Hughes reiterated that the Commission should encourage service providers to adopt the Communications Security, Reliability and Interoperability Council's ("CSRIC") best practices in regards to offering battery backup power, instead of implementing a mandatory requirement. In addition, Hughes discussed the points raised in the enclosed document, which Hughes distributed at the meeting.

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<sup>1</sup> See Reply Comments of Hughes Network Systems, LLC, PS Docket No. 14-174, *et al.* (filed Mar. 9, 2015).

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Please direct any questions to the undersigned.

Sincerely,

/s/ Jesse Jachman

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cc: Chuck Needy (FCC)  
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### **The Best Approach to Battery Backup CSRIC Best Practices**

- Hughes, a wholly owned subsidiary of EchoStar Corporation, is North America's largest provider of satellite broadband services with approximately 1,000,000 customers. Hughes satellite broadband services are used for a number of important communications services including high-speed internet and VoIP. Hughes manufactures the devices for its HughesNet<sup>®</sup> broadband services and is also a manufacturer of satellite terminals for other providers of advanced communications services in the United States, including Inmarsat's BGAN services.
- It is important that consumers have a means to ensure continuity of communications, including satellite communications, in a power outage. However, mandatory requirements are not the most effective or practical tool.
- A uniform baseline requirement for battery backup would impose significant monetary burdens on providers and, in the long term, could lead to an increased cost of service to consumers.
- In addition, it would be difficult to come up with a one-sized approach to backup power requirements because of the different capabilities of technologies.
- Instead of regulatory requirements, the FCC should encourage providers to adopt the best practices developed by the Communications Security, Reliability and Interoperability Council (CSRIC) in CSRIC IV Working Group 10B, as they are more adaptable for different technologies and will be cost effective.
- For satellite broadband providers, the FCC should encourage the following best practices from CSRIC IV Working Group 10B: New 01, 02, 06, 11, 13, 16, 18 and 20.<sup>1</sup> These are most appropriate for this technology and will still ensure that the FCC's goals are met.
- In addition, the FCC and service providers should work together to educate consumers about the necessity of having backup power, the options for monitoring and maintaining backup power, and how to prolong battery power. This will enable consumers to choose the best battery backup options that best meet their needs.

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<sup>1</sup> See CSRIC IV Working Group 10B, CPE Powering – Best Practices; Final Report – CPE Powering, 20-23 (September 2014).