



March 15, 2016

Via ECFS

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

Re: Written *Ex Parte* Presentation
ET Docket No. 15-170; RM-11673

Dear Ms. Dortch:

Pursuant to Section 1.1206 of the Commission's rules, 47 C.F.R. § 1.1206, EchoStar Technologies LLC and Hughes Network Services, LLC (collectively, "EchoStar") submit this letter to clarify and elaborate on its views in the above-referenced proceeding. As previously stated, EchoStar supports the FCC's proposed adoption of a single self-approval process unifying the existing Declaration of Conformity ("DoC") and verification procedures, but has concerns regarding eliminating the accredited lab requirement for devices currently subject to DoC procedures.¹ Other parties, in fact, raised similar concerns about eliminating the accreditation requirements.²

If, however, the FCC decides to adopt a new unified self-approval process with no accredited lab requirement, then it should consider alternative measures to mitigate the risk of harmful interference from widely used consumer devices that will no longer be subject to the accredited lab requirement. Specifically, consistent with ASC C63's proposal, the FCC should require that all labs that test equipment under the new self-approval process must comply with ASC C63 standards, inform customers and the public of such compliance through their websites or marketing material, and make records demonstrating such compliance available to the FCC or customers upon request.³

¹ See EchoStar Comments, at 3-5 (Oct. 9, 2015). For ease of reference, filings in the above-referenced proceeding are short-cited.

² See, e.g., American Association for Laboratory Accreditation Comments, at 2-3 (Oct. 9, 2015); Alcatel-Lucent Comments, at 2 (Oct. 9, 2015); American National Standards Institute Accredited Standards Committee C63 ("ASC C63") Comments, at 6-7 (Oct. 9, 2015); ARRL Comments, at 3-4 (Oct. 8, 2015); Cisco Comments, at 5-6 (Oct. 9, 2015).

³ See ASC 63 Comments, at 7.

March 15, 2016

Page 2

Please direct any questions regarding this matter to the undersigned.

Respectfully Submitted,

/s/ Jennifer A. Manner

Jennifer A. Manner

Vice President, Regulatory Affairs

cc: Bruce Romano (FCC)

Brian Butler (FCC)

Jamison Prime (FCC)

Rashmi Doshi (FCC)

Bill Hurst (FCC)

George Tannahill (FCC)