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May 31, 2005

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Federal Communications Commission
Office of Secretary

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
The Portals
445 12th Street, S.W. TW-A325
Washington, D.C. 20554

Re: Ex Parte - IB Docket 00-248

Dear Ms. Dortch:

On Tuesday, May 24, 2005, Joslyn Read, Steve Doiron, and Stan Kay of Hughes Network Systems, LLC ("HNS") met with Stephen Spaeth, Robert Fleming, and John Martin of the FCC's International Bureau, Satellite Division to discuss questions arising from the Commission's recently issued Third Further Notice of Proposed Rulemaking ("3rd FNPRM") to streamline the Commission's rules governing the licensing of satellite earth stations¹. In particular, the following issues were discussed:

- a. The time duration of a single sample over which power would be measured in a case where a VSAT system operated using slotted Aloha contention protocol. For systems having time slots of short durations, determining compliance to the mask is strongly impacted by the minimum measurement time.
- b. The time averaging approach represented by the curve in Table 2 of the 3rd FNPRM.
- c. The proposed dB increase allowed for percentages of time between those values given in Table 2.
- d. The derivation and intended application of the mask presented in Table 2, as well as its anticipated impact on the traffic carried on adjacent satellites.

¹ In the Matter of the 2000 Biennial Regulatory Review -- Streamlining and Other Revisions of Part 25 of the Commission's Rules Governing the Licensing of, and Spectrum Usage by, Satellite Network Earth Stations and Space Stations, IB Docket No. 00-248. SIXTH REPORT AND ORDER AND THIRD FURTHER NOTICE OF PROPOSED RULEMAKING. FCC 05-62. Adopted March 10, 2005; Released March 15, 2005.

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In addition, HNS reiterated its experience that there was no demonstrated need for regulation of VSAT contention protocol techniques in the record of the past two notices of proposed rulemakings, and that this remains true to its knowledge today. HNS also addressed the potential impact of certain contention protocol regulatory approaches on VSAT network operation.

Respectfully submitted,

Hughes Network Systems, LLC

By: /s/ Joslyn Read

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