



WASHINGTON, DC

DAVID S. KEIR  
202.416.6742  
DKEIR@LERMANCENTER.COM

November 12, 2013

**VIA IBFS**

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

**Re: Comprehensive Review of Licensing and Operating Rules for  
Satellite Services, IB Docket No. 12-267 – Ex Parte Notice**

Dear Ms. Dortch:

On Thursday, November 7, 2013, Steven Doiron of Hughes Network Systems, LLC (“Hughes”), spoke with Kathryn Medley, Chief, Engineering Branch, Satellite Division, regarding the above-captioned rulemaking proceeding concerning revisions to the Commission’s Part 25 Rules. Mr. Doiron reviewed concerns regarding the codification under Section 25.130(g) of “the 1-second<sup>1</sup>/10-second<sup>2</sup> policy” governing transmitting antennas licensed under a single call sign, and the potential adverse impact of this rule on the practice of licensing multiple very small aperture terminal Hub antennas under a single FCC license.

Respectfully submitted,

*s/ David S. Keir*

*Counsel to Hughes Network Systems, LLC*

cc: Kathryn Medley, FCC (via email)

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<sup>1</sup> Applicable to earth stations operating in bands shared with terrestrial services.

<sup>2</sup> Applicable to earth stations in bands where there is no co-primary allocation for terrestrial services.