



September 22, 2014

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

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

Dear Ms. Dortch:

Pursuant to Section 1.1206 of the Commission's rules, 47 C.F.R. § 1.1206, Hughes Network Systems, LLC and EchoStar Satellite Operating Corporation (collectively, "EchoStar") submit this letter summarizing a meeting on September 22, 2014 regarding the above-referenced proceeding. Present at the meeting were Jennifer A. Manner, Vice President, Regulatory Affairs, and Jesse T. Jachman, Senior Counsel, Regulatory Affairs, both of EchoStar. Attending the meeting on behalf of the Commission was Erin McGrath, Legal Advisor to Commissioner O'Rielly.

Discussions focused on the upcoming Further Notice of Proposed Rulemaking (FNPRM) in the above-referenced proceeding and the importance of having a full record developed in response to the FNPRM. To this end, EchoStar recommended that the FCC ensure that the FNPRM seek comment on a number of issues that would enable the FCC to gather information on a wide variety of Part 25 issues including performance bonds, the three strikes rule, and the first-come, first-served regime.

Specifically, EchoStar recommended that the FCC seek comment on approaches to streamline its rules so that satellite operators can more efficiently operate their fleet.

EchoStar also recommended that the FCC seek comment on other approaches to the current performance bond requirements for satellite systems, including whether other countries require performance bonds or rely on other approaches. EchoStar explained that to the extent the FCC retains its milestone requirements, it should seek comment on providing more guidance on what is required to meet each milestone. In addition, EchoStar explained that if the FCC allows the submission of simplified filings (rather than formal license applications) to establish a position in the satellite processing queue, the FCC should seek comment on whether it should impose a bond requirement or adopt an alternative approach. Further, EchoStar suggested that

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the FCC seek comment on whether the FCC should consider other frameworks instead of the first-come, first-served regime or whether it should modify the first-come, first-served regime in any way.

Please direct any questions regarding this matter to the undersigned.

Respectfully Submitted,

/s/ Jennifer A. Manner

Jennifer A. Manner

Vice President, Regulatory Affairs

EchoStar Satellite Operating Corporation  
and Hughes Network Systems, LLC

cc: Erin McGrath (FCC)