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 Kathyrn 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\(^1\)/10-second\(^2\) 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:  Kathyrn Medley, FCC (via email)

\(^1\) Applicable to earth stations operating in bands shared with terrestrial services.
\(^2\) Applicable to earth stations in bands where there is no co-primary allocation for terrestrial services.