January 23, 2015

VIA ELECTRONIC FILING

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


Dear Ms. Dortch:

On January 21, 2015, Anders Johnson, President, EchoStar Satellite Services, L.L.C., Jennifer A. Manner, Vice President, Regulatory Affairs, EchoStar Operating Corporation, (collectively, “EchoStar”) and the undersigned met with the following representatives of the International Bureau: Deputy Bureau Chief Troy Tanner, Stephen Duall, Karl Kensinger, Lynne Montgomery, Cindy Spiers, and Merissa Velez.

EchoStar previewed one element of the comments it intends to file January 29 in response to the Further Notice in the above-captioned rulemaking proceeding. Specifically, EchoStar calls on the Commission to allow U.S. satellite licensees the option, if they meet certain financial criteria, to use a corporate guarantee, as an alternative to a bond, to protect against spectrum and orbital warehousing through the milestone process. Currently, with the only option being a bond requirement, satellite licensees are forced to spend tens of thousands of dollars a year in order to maintain the bond(s). A corporate guarantee will eliminate those costs and allow companies to use that money for other purposes including investing in services to customers.

Pursuant to Sections 1.1206 of the Commission’s Rules, this letter is being filed electronically with the Commission via the Electronic Comment Filing System. Should you have any questions regarding this presentation, please contact the undersigned.
Sincerely,

/s/ Adam D. Krinsky

Adam D. Krinsky
Counsel to EchoStar

cc: Troy Tanner
Stephen Duall
Karl Kensinger
Lynne Montgomery
Cindy Spiers
Merissa Velez
Jennifer Manner