VIA ECFS

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

Re: Ex Parte Presentation - IB Docket No. 12-267

Dear Ms. Dortch:

Pursuant to 47 C.F.R. § 1.1206, EchoStar Satellite Operating Corporation and Hughes Network Systems, LLC (collectively, “EchoStar”) submit this letter in support of SES Americom Inc.’s (SES) recent ex parte.¹ Specifically, EchoStar supports SES’s proposal to increase the baseline two-degree operating levels so that they are better aligned with current spacecraft parameters, by setting the C-band EIRP downlink level at 3 dBW/4kHz and the Ku-band EIRP downlink level at 13 dBW/4kHz.

SES’s analysis supports the FCC increasing the EIRP density limit for C-band operation to 3 dBW/4kHz and for Ku-band to 13 dBW/4kHz. Under this approach, the recommended levels will provide a better baseline for most satellites to operate at their maximum levels without requiring coordination to exceed the current 10 dBW/4kHz. Accordingly, consistent with the goals of the Part 25 proceeding, adoption of this proposal will lead to reduced administrative burdens on operators when they are coordinating adjacent satellites.

Based upon the foregoing, EchoStar urges the Commission to move forward with its efforts to further streamline the Part 25 rules to allow additional operator flexibility and regulatory certainty, including adopting the proposal discussed above.

¹ SES Ex Parte, IB Docket No. 12-267 (filed July 21, 2015).
Please direct any questions regarding this matter to the undersigned.

Respectfully submitted,

/s/ Jennifer A. Manner
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