May 29, 2015

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 agreement with SES Amercom, Inc.’s (“SES”) May 13, 2015 ex parte in this docket on the issue of two-degree spacing. As EchoStar has stated in its comments and subsequent pleadings in this proceeding, EchoStar is supportive of the FCC retaining its two degree spacing policy.

As EchoStar and SES have stressed, the two degree spacing policy serves an important public policy objective – maximizing the use of the orbital arc for service to U.S. customers. In addition, the two degree spacing policy also brings the benefit of increased competition and regulatory certainty. It is because of these public interest reasons that EchoStar also supports the continued application of the two degree spacing rules and policy to the Planned FSS Ku-band (i.e., 10.7-10.95 GHz, 11.2-11.45 GHz, and 12.75-13.25 GHz) and the extended, unplanned C- and Ku-bands (i.e., 3625-3700 MHz, 5850-5925 MHz, 6425-6725 MHz, 10.95-11.2 GHz, 11.45-11.7 GHz, and 13.75-14 GHz).

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1 IB Dkt No. 12-267, Notice of Oral Ex Parte of SES Amercom, Inc. (filed May 13, 2015).
Please direct any questions regarding this matter to the undersigned.

Respectfully submitted,

/s/ Jennifer A. Manner
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and Hughes Network Systems, LLC
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