February 27, 2015

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

Re: WC Docket No. 10-90, Connect America Fund - *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 ("Hughes") submits this letter summarizing a meeting on February 26, 2015 regarding the above-referenced proceeding. Present at the meeting on behalf of Hughes were Jennifer A. Manner, Vice President, Regulatory Affairs, Jesse Jachman, Senior Counsel, Regulatory Affairs, Hossein Memarsadeghi, Vice President, Consumer Business Management, Patrick Fisher, Senior Director, Consumer Services, and Rajeev Kubba, Senior Director - Consumer Network Engineering. Attending the meeting on behalf of the Wireline Competition Bureau, Industry Analysis and Technology Division were Roger Woock, Chief, Cathy Zima, Deputy Chief, and Suzanne Yelen, Assistant Chief and from the Wireline Competition Bureau, Telecommunications Access Policy Division, Alexander Minard, Deputy Chief.

Discussions focused on an alternative approach to latency that is technology neutral and that will be a better measure of the actual customer experience for Voice over Internet Protocol ("VoIP") and web browsing. To that end, Hughes discussed the points raised in its comments whereby Hughes urged the FCC to adopt an alternative approach to latency, a "loading time" standard for web browsing and a separate test for VoIP, the R-Factor test. In the meeting, Hughes suggested that Sam Knows Whiteboxes, or a similar method, is the best way to implement testing.[1] Hughes further reiterated that by adopting an alternative, technology neutral approach to latency, the FCC will ensure that consumers have access to a wide-variety of broadband technologies through the Connect America Fund.

Please direct any questions regarding this matter to the undersigned.

Respectfully Submitted,

/s/ *Jennifer A. Manner*
Jennifer A. Manner
Vice President, Regulatory Affairs

cc: Roger Woock (FCC)
Cathy Zima (FCC)
Suzanne Yelen (FCC)
Alexander Minard (FCC)

[1] *See* WC Dkt No. 10-90, Comments of Hughes Network Systems, LLC (filed Dec. 22, 2014).