



October 10, 2013

Re: Earth Stations on Mobile Platforms (ESOMPs)

Dear Mr. Richardson:

EchoStar Satellite Operating Corporation and its wholly owned subsidiaries Hughes Network Systems, LLC and Hughes Network Systems Ltd. (Hughes), (collectively, EchoStar) hereby submits its comments in response to the above-referenced consultation. EchoStar supports Ofcom's development of a licensing regime for earth stations on mobile platforms (ESOMP). Accordingly, EchoStar responds to several of Ofcom's questions in this consultation below.

EchoStar is a diverse, dynamic company that is a significant satellite operator, services provider, and technology company. Today EchoStar owns, leases, or operates a fleet of 22 satellites in the broadcasting-satellite service (BSS), the mobile-satellite service (MSS), and the FSS bands, which provide innovative, multichannel video programming distribution through DISH® Network Corporation (DISH), and state-of-the-art fixed and mobile broadband services, among other services. EchoStar is also a leading satellite technology and services company, and employs more than 2,000 engineers focused on creating hardware and service solutions for cable, telecommunications, IPTV, and satellite companies worldwide.

Hughes Network Systems, LLC (HNS), an EchoStar company and parent of Hughes, is the global leader in providing broadband satellite networks and services for enterprises, governments, small businesses, and consumers. Having pioneered the very small aperture terminal (VSAT), Hughes is the world's leading provider of enterprise VSAT services, and has built on this expertise to bring high-speed satellite broadband service to consumers and small businesses across the United States. This broadband business is expanding with the recently launched EchoStar® XVII satellite, a next-generation, Ka band, high-throughput satellite that delivers high-speed Internet access to consumers, no matter where they live or work.

Hughes Network Systems Ltd., a subsidiary of HNS, provides a wide-range of broadband network solutions and services, including VSAT and other managed network services to enterprises in the United Kingdom and throughout Europe.

Question 1) Do you agree that Ofcom should authorize the use of ESOMPs in the UK in the frequency bands 27.5-27.8185 GHz, 28.4545-28.8265 GHz and 29.4625-30 GHz?

Answer 1) EchoStar fully supports Ofcom authorizing the use of ESOMPs in the UK in the above referenced frequency bands. There is substantial consumer interest in these types of applications particularly from commercial and private broadband users. The development of these types of services

will facilitate and speed the interchange of data and other communications services that are vital to ships, crew and passengers and cannot be met solely in the Mobile Satellite Service Bands (MSS).

Question 2) Do you agree with Ofcom's proposal to exempt from licensing the establishment, installation and use of land-based ESOMP equipment that transmits in the above-referenced frequency bands?

Answer 2) EchoStar fully supports treating ESOMP equipment as license exempt as Ofcom proposes. There is no need for an additional process to award such licenses. These earth stations do not vary technically to those earth stations which are already license exempt.

Question 3) Do you agree that ESOMP equipment mounted on aircraft or ships should be licensed to transmit in the above-referenced frequency bands using the existing Notice of Variation process?

Answer 3) Yes. Unlike terrestrial based ESOMP equipment, this equipment has the potential to cause interference into other users in other countries. Accordingly, a light touch approach, as proposed by Ofcom is warranted here.

Question 4) Do you agree with the proposed technical provisions given in the Draft Interface Requirement and Draft NoVs?

Answer 4) No comment.

We appreciate the opportunity to respond to this very important consultation. EchoStar fully supports the use of ESOMPs in the Ka band as proposed in the Ofcom consultation.