

October 24, 2013

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Re: Consultation on Ofcom Annual Plan 2014/15

Dear Sirs and Madams:

EchoStar Satellite Operating Corporation and its affiliates, Hughes Network Systems, LLC (Hughes) and Hughes Network Systems Ltd (Hughes UK), (collectively, EchoStar) hereby submit comments in response to the above-referenced consultation. EchoStar, as the operator of UK flagged satellites, supports the Office of Communications (Ofcom) development of an updated annual plan for the 2014–2015 time period.

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 fixed satellite service (FSS) bands, providing 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 thousands of engineers focused on developing advanced technologies and creating innovative solutions to meet the communications needs of consumers, enterprises and governments worldwide and for cable, telecommunications, IPTV, and satellite markets.

Hughes, an EchoStar company, 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, which delivers high-speed Internet access to consumers, no matter where they live or work.

Hughes UK, a subsidiary of Hughes, 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.

EchoStar appreciates the opportunity to comment on Ofcom's Annual Plan for the years 2014 and 2015. EchoStar appreciates the work of the United Kingdom, including Ofcom and the U.K. Space Agency (UKSA), in creating a regulatory regime that is efficient and transparent for obtaining authority to launch and operate a U.K. satellite.

However, in response to Ofcom's request for specific areas that are open to simplification in the coming year, EchoStar recommends that Ofcom, working with the UKSA, continue to further streamline, and make more coordinated, the processes for obtaining orbital slot reservations from Ofcom and for obtaining space activity licences from the UKSA. Streamlining these processes would provide potential market entrants with significant

regulatory clarity and minimise the costs and resources required in obtaining multiple governmental authorisations; thereby allowing a wider range of communications services to be delivered and increasing competition. In addition, such an effort would bolster efforts of the United Kingdom to retain and grow a strategic capability in space-based systems, services, technologies, science, and applications. At a minimum, this topic should be the subject of a future joint consultation between Ofcom and the UKSA.

EchoStar appreciates the opportunity to comment in this important proceeding. If Ofcom requires any additional information, please let us know.

Sincerely,

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