

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Hughes Network Systems, LLC)	
)	
Application for Authority to Launch and Operate a)	File Nos. SAT-LOA-20170621-00092
Ka-band and Q/V-band Geostationary Fixed-Satellite)	SAT-AMD-20170908-00128
Service Satellite at the Nominal 95° W.L. Orbital)	
Location)	

RESPONSE OF HUGHES NETWORK SYSTEMS, LLC

Hughes Network Systems, LLC (“Hughes”) hereby responds to the comments of The Boeing Company (“Boeing”) on the above-captioned application (“Application”) for authority to launch and operate a geostationary satellite orbit (“GSO”) satellite (“HNS 95W”) operating in the Ka- and Q/V-band fixed-satellite service (“FSS”).¹ Boeing admittedly is not seeking dismissal of the Application, and further does not raise any issues that would delay Federal Communications Commission (“Commission”) grant of the Application.² As demonstrated in its Application, Hughes’ HNS 95W satellite will offer substantial public interest benefits by greatly increasing commercially available satellite broadband capacity and bringing additional competition to the U.S. marketplace for broadband connectivity, including support of next-generation communications services such as 5G, machine-to-machine, and the Internet of Things.³ Accordingly, absent any objections in the record on the merits of its Application, Hughes urges an expeditious license grant for its proposed state-of-the-art broadband satellite.

¹ See Comments of Boeing, IBFS File Nos. SAT-LOA-20170621-00092 & SAT-AMD-20170908-00128 (Nov. 13, 2017) (“Boeing Comments”).

² See *id.* at 2.

³ See Hughes, Application, Narrative at 1-7.

Additionally, Hughes urges the Commission to reject Boeing’s request to refrain from any Commission action favoring GSO FSS over non-geostationary satellite orbit (“NGSO”) FSS operations in the Q/V-band.⁴ Contrary to the Commission’s rules and policies adopted in the *NGSO FSS* rulemaking,⁵ Boeing’s request effectively seeks co-equal status for both GSO and NGSO FSS operations in the Q/V-band. To the extent it seeks reconsideration of the Commission’s rules, Boeing’s request should not be properly considered in this license proceeding.

Notably, the Commission’s *NGSO FSS Order* adopted a new default GSO-NGSO sharing rule requiring NGSO operators to protect GSO networks in the Q/V- and other frequency bands.⁶ The Commission found that adopting such rule will “allow both types of [GSO and NGSO] uses by default” and is consistent with similar provisions under International Telecommunication Union rules.⁷ The Commission further found that, without such rule, “GSO networks may be precluded entirely” as a result of interference issues with NGSO operations.⁸

The Commission also eliminated as unduly restrictive Section 25.156(d)(5) of its rules, which precluded Commission consideration of GSO applications after grant of an application for NGSO operations in the Q/V- and other frequency bands.⁹ Boeing notes that the Commission

⁴ See Boeing Comments at 5.

⁵ See *Update to Parts 2 and 25 Concerning Non-Geostationary, Fixed-Satellite Service Systems and Related Matters*, Report and Order and Further Notice of Proposed Rulemaking, FCC 17-122 (rel. Sept. 27, 2017) (“*NGSO FSS Order*”).

⁶ See *id.* ¶ 39.

⁷ See *id.*

⁸ See *id.*

⁹ See *id.* (eliminating 47 C.F.R. § 25.156(d)(5)).

CERTIFICATE OF SERVICE

I, Theresa Rollins, hereby certify under penalty of perjury that the foregoing Response was served this 28th day of November, 2017, by the United States Postal Service, first class postage pre-paid, except as otherwise indicated by an asterisk, addressed to:

Audrey L. Allison
Senior Director, Frequency Management
Services
The Boeing Company
929 Long Bridge Drive
Arlington, VA 22202

Bruce A. Olcott
Jones Day
51 Louisiana Ave. NW
Washington, D.C. 20001

Counsel to The Boeing Company

Jose P. Albuquerque*
Chief, Satellite Division
International Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Stephen Duall*
Policy Branch Chief, Satellite Division
International Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Kathryn Medley*
Engineering Branch Chief, Satellite Division
International Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

 /s/ Theresa Rollins
Theresa Rollins

* Sent via electronic mail