



International Bureau

Federal Communications Commission  
Washington, DC 20554

November 28, 2006

Pantelis Michalopoulos  
Steptoe & Johnson LLP  
1330 Connecticut Ave., N.W.  
Washington, D.C. 20036

Re: EchoStar Satellite Operating Corporation  
File No. SAT-LOA-20040803-00154  
Call Sign: S2636

Dear Mr. Michalopoulos:

This letter refers to EchoStar Satellite Operating Corporation's (EchoStar) recent filing to demonstrate compliance with the critical design review (CDR) milestone for its Ka-band authorization to operate the EchoStar-113 satellite at the 113° W.L. orbital location.

Pursuant to its authorization, EchoStar was required to complete the critical design review for the EchoStar-113 satellite by October 8, 2006.<sup>1</sup> EchoStar timely submitted documentation in support of its certification that CDR was complete.<sup>2</sup> We have reviewed EchoStar's filing and determined that there is a discrepancy between EchoStar's authorization for the 113° W.L. orbital location and the CDR. Specifically, the authorization, as modified, provides that EchoStar's may use the 13.752 GHz, 13.998 GHz, 11.452 GHz and 11.698 GHz center frequencies for launch and transfer orbit operations; the 28.352 GHz and 28.598 GHz center frequencies for command operations; and the 18.302 GHz and 18.798 GHz center frequencies for telemetry operations.<sup>3</sup>

EchoStar's CDR filing, however, shows the satellite will operate using the 11.7055 GHz, 12.198 GHz, 14.001 GHz and 14.003 GHz center frequencies for orbit raising and contingency; the 29.999 GHz center frequencies for command operations; and the 19.701 GHz and 20.199 GHz center frequencies for telemetry operations.

Please explain the disparity between EchoStar's authorization and the CDR. If in fact EchoStar intends to operate the EchoStar-113 satellite using the TT&C frequencies specified in the CDR, EchoStar must file an application to modify its authorization.

---

<sup>1</sup> EchoStar Satellite L.L.C, File No. SAT-LOA-20040803-00154 (grant stamped with conditions on Oct. 8, 2004, by the Chief, Satellite Engineering Branch).

<sup>2</sup> Letter to Marlene H. Dortch, Secretary, FCC, from Pantelis Michalopoulos, Counsel for EchoStar Satellite Operating Corporation (October 8, 2006).

<sup>3</sup> EchoStar Satellite Operating Corporation, File Nos. SAT-MOD-20051007-00198, SAT-AMD-20051118-00248, and SAT-AMD-20060724-0081 (grant stamped with conditions on Oct. 19, 2006 by the Chief, Satellite Division).

---

Please submit your response to this letter to the Commission's Secretary by December 8, 2007, with a courtesy copy to Alyssa Roberts of my staff: [Alyssa.Roberts@fcc.gov](mailto:Alyssa.Roberts@fcc.gov).

Robert G. Nelson

A handwritten signature in black ink, appearing to read "R. Nelson", followed by a long horizontal flourish line.

Chief  
Satellite Division