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February 1, 2008

FILED/ACCEPTED

FEB - 1 2008

Federal Communications Commission
Office of the Secretary

Marlene H. Dortch
Secretary
Federal Communications Commission
The Portals, Room TW-A325
445 12th Street, S.W.
Washington, D.C. 20554

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

Dear Ms. Dortch:

EchoStar Corporation¹ ("EchoStar") hereby submits a redacted version of a letter and declaration from Space Systems/Loral that is being submitted in response to the January 18, 2008 letter from Robert Nelson, Chief, Satellite Division, International Bureau, to Pantelis Michalopoulos, counsel for EchoStar, requesting additional information to demonstrate compliance with the commence-physical-construction milestone for the above-captioned space

¹ EchoStar Corporation is the current licensee of the above-captioned space station license. On November 15, 2007, the International Bureau approved the *pro forma* assignment and transfer of control of this license from EchoStar Satellite Operating Corporation to EchoStar Holding Corporation, and the spin-off of that company to the shareholders of EchoStar Communications Corporation. See Public Notice, DA-07-4655, Report No. SAT-00482 (rel. Nov. 16, 2007). The approved transactions were consummated on January 1, 2008. On January 25, 2008, EchoStar Holding Corporation changed its name to EchoStar Corporation. See Letter from Pantelis Michalopoulos, Counsel for EchoStar Corporation, to Marlene H. Dortch, Secretary, FCC, filed in File No. SAT-LOA-20040803-00154 *et al.* (filed Jan. 31, 2008).

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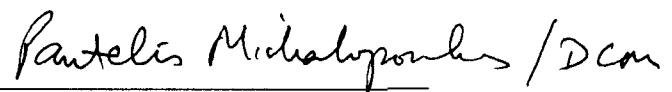
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Marlene H. Dortch
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station authorization. An unredacted version of the letter and declaration is being submitted separately with a request for confidentiality.²

Please do not hesitate to contact me if you have any questions concerning this submission.

Respectfully submitted,

 /DCM

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Counsel for EchoStar Satellite Operating Corporation

Enclosures

cc: (by electronic mail)
Jabin Vahora, International Bureau (jabin.vahora@fcc.gov)

² See Letter from Pantelis Michalopoulos, Counsel for EchoStar, to Marlene H. Dortch, Secretary, FCC, filed in File No. SAT-LOA-20040803-00154 (filed Feb. 1, 2008).

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February 1, 2008

Via HAND DELIVERY

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street S.W.
Washington, D.C. 20554

-- REDACTED -- FOR PUBLIC INSPECTION --

Re: **EchoStar Corporation (f/k/a EchoStar Holding Corporation)**
File No. SAT-LOA-20040803-00154, Call Sign S2636

Dear Ms. Dortch,

EchoStar Corporation¹ (“EchoStar”) hereby responds to the January 18, 2008 letter (“Letter”) from Robert Nelson, Chief, Satellite Division, International Bureau, to Pantelis Michalopoulos, counsel for EchoStar, requesting additional information to demonstrate compliance with the commence-physical-construction milestone for the above-captioned space station authorization.

¹ EchoStar Corporation is the current licensee of the above-captioned space station license. On November 15, 2007, the International Bureau approved the *pro forma* assignment and transfer of control of this license from EchoStar Satellite Operating Corporation to EchoStar Holding Corporation, and the spin-off of that company to the shareholders of EchoStar Communications Corporation. See Public Notice, DA-07-4655, Report No. SAT-00482 (rel. Nov. 16, 2007). The approved transactions were consummated on January 1, 2008. On January 25, 2008, EchoStar Holding Corporation changed its name to EchoStar Corporation. See Letter from Pantelis Michalopoulos, Counsel for EchoStar Corporation, to Marlene H. Dortch, Secretary, FCC (filed Jan. 31, 2008).

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Specifically, the Letter requests that EchoStar: (1) describe the hardware production that has or is currently taking place; and (2) provide representative photographs of the production that has occurred, with respect to the EchoStar-113W satellite.

In response, EchoStar submits a further declaration from its satellite manufacturer, Space Systems/Loral (“SSL”), *see Attachment 1* (“SSL Declaration”) (confidential). This declaration supplements the information previously provided to the Bureau on October 9, 2007.² As stated in the SSL Declaration: (1) SSL has procured \$[REDACTED] million worth of high-reliability components for the EchoStar-113W satellite for the construction of the satellite at SSL, *see* SSL Declaration at ¶ 2; (2) SSL had ordered specified hardware for the satellite worth \$[REDACTED] million dollars, *id.* at ¶ 3; (3) work on the various subcontracts has already commenced, and photographs of the components as they will appear when manufacturing is complete are included as Exhibit 2 to the SSL Declaration, *id.*; and (4) the satellite manufacturing contract between EchoStar and SSL remains in full force and effect, *id.* at ¶ 4. The Commission has previously found that a similar showing by TMI Communications and Co. Ltd. (“TMI”) was sufficient to demonstrate compliance with the milestone for commencement of physical construction of TMI’s licensed 2 GHz MSS satellite.³ Indeed, the value of components on order and under construction by subcontractors in the present case far exceeds the value of the components on order and under construction in the TMI case.⁴ Accordingly, the Commission should find that EchoStar has met the commence-physical-construction milestone for the EchoStar-113W satellite.

² *See* Confidential Letter from Pantelis Michalopoulos, Counsel for EchoStar Satellite Operating Corp., to Marlene H. Dortch, *filed in* File No. SAT-LOA-20040803-00154, Call Sign S2636 (filed Oct. 9, 2007).

³ *See* Letter from Gregory C. Staple, Counsel for TMI, to Marlene H. Dortch, Secretary, FCC, *filed in* File No. SAT-LOI-19970926-00161 *et al.* (filed Apr. 11, 2005); *Use of Returned Spectrum in the 2 GHz Mobile Satellite Service Frequency Bands*, FCC 05-204, Order, 20 FCC Rcd 19696, at ¶ 28 n.77 (rel. Dec. 9, 2005) (“To date, we have found that both ICO and TMI have met their milestone requirements.”); *TerreStar Networks, Inc.*, DA 07-4148, Memorandum Opinion and Order, 22 FCC Rcd 17698, at ¶¶ 3, 10 (noting that TMI had certified commencement of construction and extending subsequent launch milestone for TMI’s successor-in-interest).

⁴ *Compare TerreStar Networks, Inc.* at ¶ 3 (noting that TMI had certified construction commencement in April 2005 with a showing that SSL “was manufacturing bus electronics and payload assemblies for the satellite with parts valued at \$ 2.7 million, and that orders had been placed with subcontractors for other components of the satellite with a total cost of \$ 5.7 million.”).

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Please contact the undersigned if you have any questions about this letter.

Yours sincerely,

Handwritten signature of Pantelis Michalopoulos in black ink, including a stylized 'DM' monogram.

Pantelis Michalopoulos
Counsel for EchoStar Corporation

Attachment

cc: (by electronic mail)
Jabin Vahora, International Bureau (jabin.vahora@fcc.gov)

ATTACHMENT 1

SSL DECLARATION
(Redacted)

EXHIBIT 1
(Redacted)

EXHIBIT 2
(Redacted)