



Federal Communications Commission
Washington, D.C. 20554

December 16, 2011

Stephen Baruch
David S. Keir
Lerman Senter, PLLC
2000 K Street, N.W., Suite 600
Washington, DC 20006

Re: Hughes Network Systems, LLC,
IBFS File No. SAT-LOI-20110809-00148
(Call Sign: S2834)

Dear Messrs. Baruch and Keir:

On August 8, 2011, Hughes Network Systems, LLC (Hughes) filed a Letter of Intent to use the planned Hughes 97W space station to access the United States using portions of the Ka-band at the 97.1° W.L. orbital location.¹ Pursuant to Section 25.111(a) of the Commission's rules,² we request that Hughes provide, by letter, additional information to facilitate the processing of the application.

In its application, Hughes states that the Hughes 97W space station will be launched and operated under the authority of the United Kingdom. To facilitate review of this application, please state whether Hughes has obtained launch and operational authority under the United Kingdom Outer Space Act from the UK Space Agency for the Hughes 97W space station. If not, please provide a statement detailing the status of the application process for such authority. Also, please indicate whether Hughes has assessed whether there are sufficient ties to the United Kingdom to provide the UK Space Agency the basis for issuing an authorization, *e.g.*, procurement of a launch through a UK company.

In connection with its request for a waiver of Section 2.106 of the Commission's rules³ to operate in the 18.8-19.3 GHz frequency band on a non-conforming, non-harmful interference basis, Hughes provided an interference analysis with respect to two examples of possible non-geostationary-satellite orbit (NGSO) fixed-satellite service (FSS) Ka-band systems. This interference analysis, however, did not specifically address O3b Limited's (O3b) planned Ka-band NGSO/FSS constellation.⁴ To expedite our review of the Hughes 97W application, please revise your interference analysis to include the O3B planned Ka-band NGSO/FSS constellation.

¹ IBFS File No. SAT-LOI-20110809-00148.

² 47 C.F.R. § 25.111(a).

³ 47 C.F.R. § 2.106, note NG165.

⁴ O3b Limited, Earth Station Market Access Request, IBFS File No. SES-LIC-20100723-00952 (Call Sign E100088) (filed July 23, 2010).

We request that Hughes respond to this letter by January 17, 2012, with a copy to Lynne Montgomery of my staff (Lynne.Montgomery@fcc.gov). Failure to do so may result in the dismissal of the application, pursuant to Section 24.112(c) and 25.152(b) of the Commission's rules.⁵

Sincerely,



Robert G. Nelson
Chief, Satellite Division
International Bureau

⁵ 47 C.F.R. §§ 25.223(c) and 25.152(b).