

EXHIBIT 1

DESCRIPTION OF PROPOSED MODIFICATION (Response to Question 43, FCC Form 312)

Pursuant to Section 25.117 of the Commission's rules,¹ EchoStar Satellite Operating Corporation (together with its affiliates, "EchoStar") requests a license modification to operate the EchoStar 15 satellite (Call Sign S2811) on Direct Broadcast Satellite ("DBS") channels 3 through 32 at its existing 61.65° W.L. orbital location.²

EchoStar 15 is currently licensed as an in-orbit spare at 61.65° W.L. to provide backup capacity for EchoStar 16,³ which is authorized to operate at 61.5° W.L. on all 32 DBS channels under Commission license (for channels 3 through 32) and STA (for channels 1 and 2).⁴ EchoStar seeks to operate EchoStar 15, in conjunction with its authorized EchoStar 16 operations, to continue providing service from the nominal 61.5° W.L. orbital location for DISH Network, L.L.C.'s ("DISH") satellite television network. The proposed operations will be limited to only those channels not used on EchoStar 16 or other authorized satellites at the nominal 61.5° W.L. orbital location, such that the same channel will not be used simultaneously on more than one authorized satellite at that nominal orbital location.

EchoStar will use existing earth stations (*e.g.*, Call Signs E060003, E080007, and E080120) that are already licensed for feeder link and telemetry, tracking, and control ("TT&C")

¹ See 47 C.F.R. § 25.117.

² Concurrently with this filing, EchoStar is submitting an application for special temporary authorization ("STA") to operate EchoStar 15 at 61.65° W.L. on all 32 DBS channels.

³ See EchoStar, Stamp Grant, File Nos. SAT-MOD-20151123-00063 & SAT-AMD-20151221-00084 (granted Feb. 24, 2016).

⁴ See *EchoStar Satellite Operating Corp.*, Order and Authorization, 27 FCC Rcd 7138, ¶¶ 10-11 (IB 2012) ("*EchoStar 16 Authorization*"); EchoStar, Stamp Grant, File No. SAT-STA-20180706-00051 (granted Aug. 23, 2018).

communications with EchoStar 15 and other satellites at the 61.5° W.L. orbital cluster. Thus, no additional earth station authorization is required for the proposed operations.

The attached Schedule S and Technical Annex contain information required under Section 25.114 of the Commission's rules.⁵ As demonstrated in the attached Technical Annex, the proposed operations will cause no harmful interference to other authorized services.

Moreover, the proposed operations will serve the public interest by allowing EchoStar the flexibility to manage its satellite fleet efficiently, provide for more productive use of an in-orbit spare satellite, and further ensure full use of DBS spectrum and uninterrupted service from 61.5° W.L. nominally. The Commission has a longstanding policy of leaving fleet management decisions to satellite operators because doing so generally serves the public interest. Specifically, the Commission has determined that the satellite licensee "is in a better position to determine how to tailor its system to meet the particular needs of its customers."⁶ Thus, the Commission "will generally grant a [satellite] licensee's request to modify its system, provided there are no compelling countervailing public interest considerations."⁷

Based upon the foregoing, the Commission should grant the requested license modification to operate EchoStar 15 on DBS channels 3 through 32 at its existing orbital location. The proposed operations will facilitate efficient satellite fleet management, permit more productive use of an in-orbit spare, and further ensure full use of DBS spectrum and uninterrupted service from the nominal 61.5° W.L. orbital location..

⁵ See 47 C.F.R. § 25.114.

⁶ *AMSC Subsidiary Corporation*, Order and Authorization, 13 FCC Rcd 12316, ¶ 8 (IB 1998).

⁷ *Id.*; see also *SES Americom, Inc.*, Order and Authorization, 21 FCC Rcd. 3430, ¶ 8 (2006) (FCC "generally has allowed satellite operators to rearrange satellites in their fleet to reflect business and customer considerations where no public interest factors are adversely affected").