

EXHIBIT 1
NARRATIVE DESCRIPTION OF PROPOSED MODIFICATION
(EXTENSION REQUEST)
(Response to Question 43)

Pursuant to Section 308, 309 and 319 of the Communications Act of 1934, as amended, 47 U.S.C. §§ 308, 309 and 319, Part 25 of the Commission’s rules, 47 C.F.R. Part 25, and Section 25.117 of the Commission’s rules, 47 C.F.R. § 25.117, DISH Operating L.L.C. (“DISH”) files this application¹ to extend its authority to operate the EchoStar 15 satellite (S2811) at the 61.65° W.L. orbital location until August 6, 2029.

The Commission originally granted DISH authority to operate EchoStar 15 on July 1, 2010.² The instrument of authorization stated that the term of the license for EchoStar 15 would expire ten years from the date on which DISH certified to the FCC that the satellite had been successfully placed into orbit and its operation fully conformed to the terms and conditions of its authorization (August 6, 2020).³

Because the original EchoStar 15 license expires on August 6, 2020, DISH hereby requests a renewal of this license to continue to operate EchoStar 15 at 61.65° W.L. for another nine years to August 6, 2029. DISH is currently providing international, high-definition (“HD”)

¹ This application qualifies as a minor modification because it proposes no change to orbital location or authorized frequencies, nor will it increase the potential for interference. Rather, DISH is requesting renewal of its authority to continue to operating EchoStar 15 at 61.65° W.L.

² See EchoStar Corporation, File No. SAT-LOA-20100310-00043 (granted July 1, 2010).

³ *Id.* at Condition 4 (“The license term for the ECHOSTAR-15 space station is 10 years, and will begin to run on the date EchoStar certifies to the Commission that the satellite has been successfully placed into orbit and its operation fully conforms to the terms and conditions of this authorization.”); see Letter from Christopher R. Bjornson, Counsel for DISH Operating L.L.C., to Robert Nelson, International Bureau, Federal Communications Commission (Aug. 6, 2010) (certifying that EchoStar 15 “has been successfully placed into orbit, is operation, and fully complies to the terms and conditions of its authorization”). The International Bureau approved the relocation of EchoStar 15 to 61. 65° W.L. on February 24, 2016 and confirmed that the space station license for S2811 would expire on August 6, 2020. See File No. SAT-AMD-20151221-00084 (Feb. 24, 2016).

and local programming using the EchoStar 15 satellite at 61.65° W.L. DISH has provided continuous DBS service from its various orbital locations since 1996, and is now a leading multichannel video programming distributor with approximately 10 million subscribers.

The requested renewal will serve the public interest by enabling DISH to continue providing high-quality DBS services to its customers from the 61.65° W.L. orbital location and promote competition in the multichannel video programming industry. Continued access to the DBS frequencies at 61.65° W.L. is also important to ensure that DISH can continue to provide international, HD and local programming. Indeed, DISH's ability to compete in this market would be seriously impaired without the continued ability to provide service from the 61.65° W.L. orbital location.

A completed FCC Form 312 is attached, and DISH hereby incorporates by reference the technical information previously provided regarding the operations of EchoStar 15.

DISH calculates that there is sufficient fuel onboard the EchoStar 15 spacecraft to continue providing reliable DBS service throughout the requested term extension and to complete deorbit as planned. Specifically, DISH has calculated that the EchoStar 15 end-of-life will occur in 2029.⁴ DISH affirms that all subsystems on the spacecraft are operating normally and that the satellite has no single point of failure that could affect its ability to conduct end-of-life procedures as planned. In addition, DISH affirms that the telemetry, tracking, and command links for EchoStar 15 are fully functional.

For the foregoing reasons, DISH respectfully requests that the Commission promptly grant this application for a minor modification to extend the expiration date on the EchoStar 15 license to August 6, 2029.

⁴ DISH will make the appropriate filings for de-orbiting EchoStar 15 at that appropriate time.

June 19, 2020