

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

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In the Matter of )

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**ECHOSTAR SATELLITE OPERATING ) File No. SAT-STA-\_\_\_\_\_**

**CORPORATION ) File No. SAT-STA-\_\_\_\_\_**

) Call Sign S2741

Applications for Special Temporary )

Authority to Move EchoStar 15 to, and )

Operate at, 61.65° W.L. )

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**APPLICATIONS FOR SPECIAL TEMPORARY AUTHORITY**

EchoStar Satellite Operating Corporation (“ESOC,” and collectively with its affiliates, “EchoStar”) hereby requests 30-day special temporary authority (“STA”) under Section 25.120(b) of the Commission’s rules<sup>1</sup> beginning on or about June 15, 2012: (a) to move the EchoStar 15 satellite from its current orbital position at 61.55° W.L. to the 61.65° W.L. orbital position; and (b) to operate the satellite at 61.65° W.L. ESOC further requests a 180-day STA to operate EchoStar 15 at 61.65° W.L. once the satellite has been relocated.<sup>2</sup> This request is being made in anticipation of the upcoming launch of EchoStar 16,<sup>3</sup> and is part of a series of moves that EchoStar anticipates in order to accommodate EchoStar 16 at the nominal 61.5° W.L. orbital

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<sup>1</sup> 47 C.F.R. § 25.120(b).

<sup>2</sup> EchoStar will maintain EchoStar 15 within a ± 0.05° station-keeping box while at 61.65° W.L.

<sup>3</sup> See File Nos. SAT-LOA-20110902-00172 (filed Sept. 2, 2011); SAT-STA-20110902-00171 (filed Sept. 2, 2011); SAT-STA-20120315-00049 (filed Mar. 15, 2012).

location.<sup>4</sup> EchoStar anticipates that once EchoStar 16 is certified as operational at the nominal 61.5° W.L. orbital location, no more than three satellites will continue to serve that location in the long term. EchoStar is exploring several possible fleet adjustments, and will be able to evaluate its alternatives more fully once EchoStar 16 is successfully launched and operating.

## **I. BACKGROUND**

As the Commission is aware, on July 10, 2010, EchoStar successfully launched EchoStar 15, a 32-transponder Direct Broadcast Satellite (“DBS”) that, in light of the loss of AMC-14,<sup>5</sup> effectively replaced EchoStar 3.<sup>6</sup> EchoStar 15 became fully operational on August 5, 2010. EchoStar 15 has been operating at 61.55° W.L. since its launch, providing capacity for EchoStar’s customer, DISH Network L.L.C., to provide Direct Broadcast Satellite (“DBS”) service to U.S. consumers.

EchoStar is now preparing to launch the EchoStar 16 satellite as early as August 2012, which will further supplement the service provided from 61.5° W.L. and ensure the continued full utilization of the DBS spectrum at that orbital location. In anticipation of this launch and the assumption of operations at 61.5° W.L. by EchoStar 16, EchoStar is repositioning the spacecraft in the 61.5° W.L. orbital cluster. Upon completion of the EchoStar 15 relocation, EchoStar will have satellites at 61.35° W.L. (EchoStar 12), 61.65 ° W.L. (EchoStar 15), and 61.8 ° W.L. (EchoStar 3).<sup>7</sup> Upon the successful launch of EchoStar 16 later this year, which will be placed at

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<sup>4</sup> See Stamp Grant, File No. SAT-STA-20120424-00073 (granted Apr. 30, 2012); Stamp Grant, File No. SAT-STA-20120524-00088 (granted May 31, 2012); File No. SAT-STA-20120424-00074 (filed Apr. 24, 2012).

<sup>5</sup> See Letter from Pantelis Michalopoulos, Counsel for EchoStar Corporation, to Marlene H. Dortch, Secretary, FCC, File No. SAT-STA-20080923-00193 (Dec. 30, 2008).

<sup>6</sup> See Stamp Grant, File No. SAT-LOA-20100310-00043 (granted July 1, 2010).

<sup>7</sup> Policy Branch Information, Actions Taken, Report No. SAT-00865, File No. SAT-STA-20120424-00073 (eff. April 30, 2012).

61.5° W.L., EchoStar's satellites in the cluster will be aligned at 0.15° separation, with the three operational satellites centered around the 61.5° W.L. nominal orbital location.

For the reasons set forth below, the relocation of EchoStar 15 to 61.65° W.L. will not cause harmful interference to any authorized user of the spectrum and would be in the public interest. Accordingly, the Commission should grant the requested STAs.

## **II. THIS REQUEST IS IN THE PUBLIC INTEREST AND WILL NOT CAUSE HARMFUL INTERFERENCE**

The requested STAs are in the public interest because the move will ensure safe station-keeping margins for each of the satellites that are located at the nominal 61.5° W.L. orbital location, which is a critical precursor to EchoStar 16's entry into service later this year.

Relocation of EchoStar 15 to 61.65° W.L. as proposed herein will not harm adjacent satellite operators, because the move is within the 61.5° W.L. orbital cluster. Such a move within the cluster does not increase interference risks for nearby Broadcast Satellite Service ("BSS") satellites. Moreover, ESOC will operate EchoStar 15 on a non-harmful interference basis pursuant to the requested STAs. Finally, the relocation will not adversely affect existing customer service because service will be maintained on EchoStar 15 during and following the in-cluster move.

## **III. OPERATIONAL PARAMETERS**

During relocation maneuvers and operations of EchoStar 15 at the 61.65° W.L. orbital location, EchoStar will operate the satellite subject to the following conditions:

1. EchoStar shall coordinate all drift orbit TT&C operations with other potentially affected in-orbit operators.
2. Drift operations and operations at 61.65° W.L. shall be on a non-harmful interference basis, meaning that EchoStar shall not cause interference to, and shall not claim protections from, interference caused to it by any other lawfully operating satellites.

