



May 4, 2016

**By IBFS**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, D.C. 20554

Re: IBFS File Nos. SAT-STA-20160202-00010, SES-STA-20160202-00110 &  
SES-STA-20160408-00341 (Call Signs S2931, E070014 & E980047)

Dear Ms. Dortch:

DISH Operating L.L.C. and EchoStar Broadcasting Corporation (together with their affiliates, "DISH") submit this letter to (i) request special temporary authority ("STA") to conduct in-orbit testing ("IOT") of the EchoStar 18 satellite (Call Sign S2931) at the 67.1° W.L. orbital location using the satellite's assigned direct broadcast satellite ("DBS") frequencies; and (ii) amend the above-referenced STA applications to operate earth stations in Gilbert, AZ, and Cheyenne, WY (Call Signs E070014 & E980047), for IOT and telemetry, tracking, and command ("TT&C") communications with EchoStar 18.<sup>1</sup>

Pursuant to FCC approval of the above-referenced satellite STA application,<sup>2</sup> EchoStar 18 received authority to initially locate at 137.75° W.L. after launch and orbit-raising maneuvers, before moving to its assigned orbital location at 109.9° W.L. DISH now requests authority to conduct IOT and TT&C operations, including related earth station communications, of EchoStar 18 while the satellite remains temporarily at 67.1° W.L. (in lieu of 137.75° W.L.), prior to moving to its proposed assigned orbital location at 61.35° W.L.<sup>3</sup>

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<sup>1</sup> DISH concurrently is amending one of the above-referenced STA applications (*see* IBFS File No. SES-STA-20160408-00341), and withdrawing STA applications for four other earth stations, which will no longer be required for IOT and TT&C operations with EchoStar 18 (*see* IBFS File Nos. SES-STA-20160408-00339, SES-STA-20160408-00340, SES-STA-20160408-00342 & SES-STA-20160408-00343).

<sup>2</sup> *See* IBFS File Nos. SAT-STA-20160202-00010 (granted Mar. 30, 2016).

<sup>3</sup> DISH shortly will file a modification application to change EchoStar 18's assigned orbital location from 109.9° W.L. to 61.35° W.L.



Thus, DISH anticipates the following schedule, as revised:

- (1) EchoStar 18 is scheduled for launch in June 2016.
- (2) After launch and orbit-raising maneuvers, EchoStar 18 will be located at 67.1° W.L., and IOT will commence for approximately 60 days.
- (3) After completion of IOT, EchoStar 18 will be moved to its proposed assigned orbital location at 61.35° W.L.

The requested testing will not cause harmful interference to other authorized co-frequency broadcasting satellite service (“BSS”) operations. The nearest co-frequency satellites are Echo 12, Echo 15, and Echo 16 at the 61.5° W.L. orbital cluster and Nimiq 5 at 72.7° W.L., which are being utilized by EchoStar for provision of BSS. The IOT test plan procedures will be such that no interference will be generated into the adjacent EchoStar services. In the unlikely event of harmful interference, DISH is prepared to take appropriate measures to eliminate the interference, including immediately terminating IOT upon receiving notice of such interference.

Grant of the requested STA will serve the public interest by allowing DISH to conduct IOT operations required to ensure that the EchoStar 18 satellite is fully operational and capable of providing service to millions of DISH subscribers.

Please direct any questions regarding this matter to the undersigned.

Sincerely,

EchoStar Broadcasting Corporation

DISH Operating L.L.C.

/s/ Jennifer A. Manner  
Jennifer A. Manner  
Senior Vice President of Regulatory Affairs

/s/ Alison A. Minea  
Alison A. Minea  
Director and Senior Counsel, Regulatory Affairs

cc: Stephen Duall  
Paul Blais