

EXHIBIT 1

REQUEST FOR SPECIAL TEMPORARY AUTHORIZATION (Response to Question 8, STA Form)

Pursuant to Section 25.120(b)(3) of the Commission's rules,¹ EchoStar Satellite Operating Corporation (together with its affiliates, "EchoStar") requests a 60-day special temporary authorization ("STA"), commencing approximately on November 1, 2018, to operate the EchoStar 15 satellite (Call Sign S2811) on all 32 Direct Broadcast Satellite ("DBS") channels 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.

¹ See 47 C.F.R. § 25.120(b)(3).

² Concurrently with this filing, EchoStar is submitting an application for license modification ("Modification Application") to operate EchoStar 15 at 61.65° W.L. on DBS channels 3 through 32. The Modification Application includes Schedule S and Technical Annex information that supports the proposed operations.

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).

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”) 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 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.”⁵ Thus, the Commission “will generally grant a [satellite] licensee’s request to modify its system, provided there are no compelling countervailing public interest considerations.”⁶

At the same time, the proposed operations will cause no harmful interference to other authorized services, as demonstrated in the Technical Annex of the Modification Application. Moreover, as noted below, EchoStar 15 will operate under STA on an unprotected, non-harmful interference basis and subject to conditions, including the following:

1. All authorized operations will be on an unprotected and non-harmful interference basis (*i.e.*, EchoStar will not cause harmful interference to, and will not claim interference protection from, any other lawfully operating station).
2. In the event of any harmful interference resulting from the authorized operations, EchoStar will cease operations immediately upon notification of such interference and will immediately inform the Commission in writing of such interference.

⁵ *AMSC Subsidiary Corporation*, Order and Authorization, 13 FCC Rcd 12316, ¶ 8 (IB 1998).

⁶ *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”).

3. EchoStar will coordinate operations with other potentially affected in-orbit satellite operators.
4. EchoStar will maintain the satellite at 61.65° W.L. with an east-west longitudinal station-keeping tolerance of +/-0.05 degree.
5. EchoStar's use of channels 1 and 2 shall cause no harmful interference to any other lawfully operating radio station, and EchoStar shall cease operation on these channels immediately upon notification of such interference.
6. EchoStar shall not claim protection from interference from any other lawfully operating radio station with respect to its operations on channels 1 and 2.
7. EchoStar has informed its customers in writing that services using channels 1 and 2 from the 61.5° W.L. cluster will be discontinued upon termination of its temporary authority to operate on these channels.
8. EchoStar will continue to provide the required terms set forth in the original grant [*i.e., EchoStar 16 Authorization*] in its monthly billing statements and marketing notifications.
9. EchoStar will continue to use channels 1 and 2 at the nominal 61.5° W.L. orbital location only for free-standing, separate programming packages that are not required as a condition of purchasing any other programming packages and that are readily capable of being withdrawn on short notice.
10. EchoStar will cease operations on channels 1 and 2 at the nominal 61.5° W.L. orbital location upon the launch and operation of a satellite regularly licensed to operate on these channels at this location.

Based upon the foregoing, the Commission should grant the requested STA to operate EchoStar 15 on all 32 DBS channels 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.