



January 8, 2018

By Electronic Filing

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: *HNS License Sub, LLC, Applications for to Operate Gateway Earth Stations to Facilitate Operation of a Ka-band and Q/V-band Geostationary Fixed-Satellite Service Satellite at the Nominal 95° W.L. Orbital Location, File Nos. SES-LIC-20170807-00876 – 00895*

Dear Ms. Dortch:

HNS License Sub, LLC (“Hughes”) files this letter to supplement the above-referenced applications (“Applications”) with declarations from Hughes Network Systems, LLC and Space Systems/Loral, LLC to support Hughes’s request to waive the build-out requirement contained in Section 25.113(a)(1) of the Federal Communications Commission’s rules.¹ In these applications, Hughes seeks authority to operate 20 gateway earth stations that will be deployed at certain designated sites throughout the United States to communicate with the Hughes 95W satellite system (“Hughes 95W”). Once in commercial service, the Hughes 95W space station will provide advanced broadband satellite services at speeds of approximately 100 Mbps to users across the United States.

As Hughes has explained, this waiver is necessary to ensure that Hughes has certainty as to where its gateway earth stations will be located as it continues and completes construction of its HNS 95W space station by Space Systems/Loral, LLC (“SSL”).² The attached Declarations from SSL and Hughes underscore the disruptive and costly challenges that would be posed by changing the locations of the gateway earth stations. David Bernstein, Senior Vice President of Program Management for SSL, explains:

¹ HNS License Sub, LLC, *Applications to Operate Gateway Earth Stations to Facilitate Operation of a Ka-band and Q/V-band Geostationary Fixed-Satellite Service Satellite at the Nominal 95° W.L. Orbital Location*, IBFS File Nos. SES-LIC-20170807-00876 – 00895, Exhibit C (filed Aug. 7, 2017). No comments or Petitions to Deny were filed in response to the 20 applications. The Applications were placed on Public Notice on October 18, 2017. Satellite Communications Services re: Satellite Radio Applications Accepted for Filing, *Public Notice*, Report No. SES-02000 (Oct. 18, 2017).

² See Hughes Network Systems, LLC, *Application for Authority to Launch and Operate a Geostationary Orbit Ka-band and Q/V-band Satellite at the Nominal 95° W.L. Orbital Location*, IBFS File No. SAT-LOA-20170621-00092 (filed June 21, 2017).

Gateway deployment at the proposed sites is integral to finalizing the design and commencing construction of the HNS 95W space station, and any material change of sites available for these gateways will likely impact the design and construction of the HNS 95W space station and overall satellite system, thus resulting in significantly higher costs, construction and commencement delays and reduced system capabilities and spectrum efficiencies.

The Hughes Declaration provided by Dave Roos, Senior Vice President of Hughes Network Systems, LLC further explains:

The current spacecraft and system design rely totally on the availability of this spectrum at the specified gateway locations. Material changes to the spectrum or gateway locations after the Preliminary Design Review (PDR) in February 2018 will result in additional development costs, construction and service commencement delays, and reduced system capabilities and spectrum efficiencies. These additional costs and delays will become highly significant the further post PDR they occur and have the potential to fatally disrupt the project.

Accordingly, as Hughes has a strong public interest reason for the FCC granting its waiver request of the build-out time frame for construction and placement into service of its 20 gateway earth station applications, Hughes requests a timely grant of the pending gateway earth station applications and corresponding waiver request.

Please direct any questions regarding this matter to the undersigned.

Respectfully Submitted,

/s/ Jennifer A. Manner

Jennifer A. Manner
Senior Vice President, Regulatory Affairs
11717 Exploration Lane
Germantown, MD 20876
(301) 428-5893

Enclosures

cc: Tom Sullivan
Jim Schlichting
Jose Albuquerque
Kathryn Medley
Paul Blais
Rachael Bender

DECLARATION

On behalf of Space Systems/Loral, LLC (“SSL”), I declare that the following facts are true and correct to the best of my knowledge:

1. I am employed as Senior Vice President, Program Management of SSL and, in such capacity, am responsible for the technical design and manufacture of the HNS 95W satellite system proposed in the satellite and gateway applications (collectively, the “Applications”) of Hughes Network Systems, LLC and HNS License Sub, LLC (collectively, “Hughes”).¹
2. Gateway deployment at the proposed designated sites is integral to finalizing the design and commencing construction of the HNS 95W space station, and any material change of sites available for these gateways will likely impact the design and construction of the HNS 95W space station and overall satellite system, thus resulting in significantly higher costs, construction and service commencement delays, and reduced system capabilities and spectrum efficiencies.

Executed on December 22, 2017:



David Bernstein
Senior Vice President, Program Management
Space Systems/Loral, LLC

¹ See Hughes, IBFS File Nos. SAT-LOA-20170621-00092 & SAT-AMD-20170908-00128 (filed June 2 & Sept. 8, 2017); Hughes, IBFS Files Nos. SES-LIC-20170807-00876 *et seq.* (filed Aug. 7, 2017).

DECLARATION

I declare under penalty of perjury that the following facts are true and correct to the best of my knowledge, information, and belief:

1. I am employed as Senior Vice President, Engineering of Hughes Network Systems, LLC, and, in such capacity, am responsible for certain technical design elements of the HNS 95W satellite system proposed in the satellite and gateway applications (collectively, the “Applications”) of Hughes Network Systems, LLC and HNS License Sub, LLC (collectively, “Hughes”).¹
2. I have reviewed the technical information submitted in the Applications, am technically qualified to review and assess the accuracy of such information, and am familiar with the Commission’s Part 25 technical rules.
3. As noted in the Applications, the HNS 95W space station is being designed to utilize 20 gateway earth stations that will be deployed at certain designated sites throughout the United States.² The proposed distribution of geographically separated gateways over a wide area across the United States is specifically designed to comply with the Commission’s siting and other technical rules, while enhancing communications reliability and maximizing spectrum efficiency and use without causing harmful interference to other gateways.³
4. The proposed HNS 95W gateways will incorporate new and innovative Q/V-band technology and components, which are not commercially available yet and will require at least two to three years to test and develop. Accordingly, we cannot deploy our gateways at this time.
5. The current spacecraft and system design rely totally on the availability of this spectrum at the specified gateway locations. Material changes to the spectrum or gateway locations after the Preliminary Design Review (PDR) in February 2018 will result in additional development costs, construction and service commencement delays, and reduced system capabilities and spectrum efficiencies. These additional costs and delays will become highly significant the further post PDR they occur and have the potential to fatally disrupt the project.

Executed on January 4, 2017:

/s/ 

Dave Roos,
Senior Vice President, Engineering
Hughes Network Systems, LLC

¹ See Hughes, IBFS File Nos. SAT-LOA-20170621-00092 & SAT-AMD-20170908-00128 (filed June 2 & Sept. 8, 2017); Hughes, IBFS Files Nos. SES-LIC-20170807-00876 *et seq.* (filed Aug. 7, 2017).

² See Hughes, IBFS Files Nos. SES-LIC-20170807-00876 *et seq.*, Attachment 1 (Narrative), at 2.

³ See *id.*