



Federal Communications Commission  
Washington, D.C. 20554

**March 4, 2021**

Ms. Jennifer Manner  
HNS License Sub, LLC  
11717 Exploration Lane  
Germantown, MD 20876  
[Jennifer.Manner@echostar.com](mailto:Jennifer.Manner@echostar.com)

Re: Gateway Earth Stations: IBFS File Nos.  
SES-MOD-20201204-01305, Call Sign: E170163  
SES-MOD-20201204-01306, Call Sign: E170164  
SES-MOD-20201204-01308, Call Sign: E170153  
SES-MOD-20201204-01309, Call Sign: E170165  
SES-MOD-20201204-01310, Call Sign: E170169

Dear Ms. Manner:

On December 4, 2020, HNS License Sub, LLC (HNS) filed the above referenced applications to modify gateway earth stations licensed to operate in Cheyenne, WY, Bismarck, ND, Lindon, UT, Simi Valley, CA, and Quincy, WA. Each of the applications must demonstrate compliance with Upper Microwave Flexible Use Service (UMFUS) operations in accordance with section 25.136 of the Commission's rules.<sup>1</sup> Pursuant to section 25.111(a), we request that HNS submit the following information to clarify or supplement its initial showing for each application:

- 1) For each frequency band, demonstrate compliance with the numerical limits of earth stations within each county and partial economic area (PEA). When demonstrating compliance with regard to any PEA, please provide the PEA number, the counties associated with the PEA, and a list or table of any earth stations pending or licensed under section 25.136 within each such county as part of analysis required under 47 CFR §§ 25.136(a)(4)(i), 25.136(d)(4)(i) and 25.136(e)(4)(i).
- 2) In accordance with 47 CFR §§ 25.136(a)(4)(ii), 25.136(d)(4)(ii) and 25.136(e)(4)(ii), specify whether and to what extent HNS is using a "clear sky power" value. Such demonstrations should take into account worst case input power density in addition to input power density during clear sky conditions. If relying on clear sky conditions, please explain why that assumption is appropriate for the specific circumstances and location.
- 3) In accordance with 47 CFR § 25.136(d)(4)(ii), provide a study of the maximum permitted population within -77.6 dBm/m<sup>2</sup>/MHz PFD contour of earth stations, as it relates to the associated PEA. All counties within the PEA should actually be addressed in this analysis in addition to the county where the earth station is located.

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<sup>1</sup> 47 CFR § 25.136. *See also* International Bureau Issues Guidance on Siting Methodologies for Earth Stations Seeking to Operate in the 24.75-25.25 GHz, 27.5-28.35 GHz, 35.7-40 GHz, 47.2-48.2 GHz, and 50.4-51.4 GHz Frequency Bands to Demonstrate Compliance with Section 25.136, Public Notice, Report No. SPB-281, DA 20-631 (June 16, 2020).

- 4) Pursuant to 47 CFR § 25.136(e)(4)(ii), provide a study of the maximum permitted population within -77.6 dBm/m<sup>2</sup>/MHz PFD contour of the earth stations outside of the grandfathered earth station location.
- 5) As part of its analysis under 47 CFR §§ 25.136(a)(4)(iii), 25.136(d)(4)(iii) and 25.136(e)(4)(iii), HNS acknowledges that for the Lindon UT and Bismarck, ND stations there is PFD contour overlap of a major highway. If HNS plans to rely on terrain, clutter and/or shielding installation to comply with requirements of these rules, HNS should provide details and analysis about these method(s) and mitigating effects, how they will ensure compliance with the rules.
- 6) Confirm that frequency coordination has been completed using the applicable processes contained in 47 CFR 101.103(d), as set forth in 47 CFR § 25.136(d)(4)(iv). The Comsearch Coordination Report provided for the 47.2-48.2 GHz frequency band notes that coordination had been completed based 47 CFR § 25.136(a)(4)(iv), and not 47 CFR § 25.136(d)(4)(iv). Please confirm whether this was an administrative error and certify that frequency coordination was completed under 47 CFR 25.136(d)(4)(iv) for this frequency band. If Comsearch did not coordinate under 47 CFR § 25.136(d)(4)(iv), please revise the analysis accordingly and re-coordinate with the affected parties.
- 7) As part of its analysis under 47 CFR § 25.136(e)(4)(iv), provide a statement in the narrative about coordination efforts in the 50.4-51.4 GHz frequency band.

Please submit this requested material within 30 days of the date of this letter.

Sincerely,

*Paul E. Blais*

Paul E. Blais  
Chief, Systems Analysis Branch  
Satellite Division  
International Bureau