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February 10, 2009

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Ex Parte Notice -- Applications of Row 44, Inc. (Call Sign E080100; File Nos. SES-LIC-20080508-00570, SES-AMD-20080619-00826; SES-AMD-20080819-01074; SES-AMD-20080829-01117; SES-AMD-20090115-00041; and SES-STA-20080711-00928)

Dear Ms. Dortch

This letter is submitted on behalf of Hughes Network Systems, LLC (“Hughes”), pursuant to Section 1.1206 of the Commission’s Rules, to provide details of a joint *ex parte* meeting involving Hughes and counsel for Row 44, Inc. (“Row 44”) concerning the above-referenced applications. Hughes understands that Row 44 will be filing a separate *ex parte* notice regarding this meeting.

At yesterday’s meeting, Hughes was represented by Steven Doiron, its Senior Director of Regulatory Affairs, and the undersigned counsel. Hughes expressed its concern that the extended application process was unnecessarily hindering Row 44’s ability to test both the technical and system performance characteristics of its innovative system. Hughes also expressed its belief that Row 44 has demonstrated that it is fully qualified to be granted, at a minimum, the limited Special Temporary Authority it seeks to operate twelve remote terminals to conduct technical trials and marketing studies.

In this last connection, Hughes identified its own strong interest in the integrity of the two-degree spacing policy to prevent harmful and unacceptable interference to satellite operators and their customers who are potentially affected by Row 44’s operations. As a significant customer of both Intelsat and SES Americom, with capacity both on the satellites to be accessed by Row 44 and on other satellites within the ± 6 degree coordination zone adjacent to these satellites, Hughes, like the satellite operators that have signed on to the Row 44 Test Plan, has a direct and substantial interest in protecting the value and utility of the spectrum it uses on a daily basis. Hughes is



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satisfied that Row 44's proposed operations under both the requested STA and the associated long-pending license application, do not pose any unresolved interference concerns about the antenna system that Row 44 will deploy. Hughes also noted for the participants that as the Hub service provider for the Row 44 network, Hughes will work closely with Row 44 on an ongoing basis to help monitor the performance of its system, both in the testing phase and following full system deployment.

For these reasons, Hughes urged the International Bureau to proceed quickly to review Row 44's Test Plan and grant the requested STA necessary to proceed with the technical trials proposed.

Should there be any further questions regarding this matter, please contact the undersigned counsel.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'Stephen D. Baruch', written over the typed name.

Stephen D. Baruch

Attorney for Hughes Network Systems, LLC

cc: John Giusti
Rod Porter
Karl Kensinger
Stephen Spaeth
Bob Nelson
Scott Kotler
Steve Duall
William Bell
Steven Doiron, Hughes
David Keir, Counsel to Row 44