

## EXHIBIT 1

### REQUEST FOR SPECIAL TEMPORARY AUTHORIZATION (Response to Question 12, FCC Form)

Pursuant to Section 25.120(b)(3) of the Commission's rules,<sup>1</sup> HNS License Sub, LLC (together with its affiliates, "Hughes") requests a 60-day renewal of its special temporary authorization ("STA"), which expired on September 29, 2017, to continue operating up to 100,000 remote earth terminals (90 cm. in diameter) in the fixed satellite service ("FSS") on the following Ka-band frequencies: 28.35-28.6 GHz (uplink), 29.25-30.0 GHz (uplink), 18.3-19.3 GHz (downlink), 19.7-20.2 GHz (downlink).<sup>2</sup> These earth terminals will continue to operate with certain Ka-band FSS satellites to provide high-speed broadband services to consumers throughout the United States utilizing the latest technologies.

#### I. BACKGROUND

Hughes holds a blanket license (Call Sign E060445) ("Ka-band Blanket License") to operate a network of transmit/receive Ka-band FSS earth terminals used to provide high-speed broadband services to U.S. consumers. These licensed earth terminals include antennas of various sizes, ranging from 69 cm. to 3.5 m. in diameter, and are authorized to communicate with a number of Ka-band satellites,<sup>3</sup> including the following:

- 1) AMC-15 at 105° W.L. (U.S.-licensed);
- 2) AMC-16 at 85° W.L. (U.S.-licensed);
- 3) EchoStar-9 at 121° W.L. (U.S.-licensed);

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<sup>1</sup> See 47 C.F.R. § 25.120(b)(3).

<sup>2</sup> Hughes has a pending modification application for long-term authority to operate these same Ka-band FSS earth terminals. See Hughes, Application for Modification, IBFS File No. SES-MOD-20170726-00811 (July 26, 2017) ("Hughes Modification Application"). With respect to the 29.25-29.30 GHz band, Hughes seeks authorization for uplink transmissions in the band to only the EchoStar XVII and EchoStar XIX satellites, subject to the limits agreed upon in applicable coordination agreements with other satellite operators, including Iridium. See Letter from Jennifer A. Manner, EchoStar, to Marlene H. Dortch, Secretary, FCC, IBFS File Nos. SES-MOD-20170726-00811 & SES-STA-20170721-00792 (Aug. 15, 2017).

<sup>3</sup> See Hughes, FCC Radio Station Authorization, Call Sign E060445, IBFS File No. SES-MOD-20151102-00791 (granted May 23, 2016).

- 4) EchoStar XVII at 107.1° W.L. (U.S.-licensed); and
- 5) EchoStar XIX (a/k/a JUPITER 2 or JUPITER 97W) (U.S.-licensed).<sup>4</sup>

## II. DESCRIPTION OF REQUESTED STA RENEWAL AND WAIVER

Hughes requests a 60-day STA renewal to continue operating up to 100,000 Ka-band FSS earth terminals (90 cm. in diameter) manufactured by Skyware Global. Like other earth terminals authorized under the Ka-band Blanket License, the 90 cm. earth terminals will continue operating with the same Ka-band satellites listed in Section I above, including EchoStar XIX, to provide high-speed broadband services to consumers throughout the United States.

The subject earth terminals are fully consistent with the FCC's technical requirements,<sup>5</sup> including power density limits under 47 C.F.R. § 25.138 and cross-polarization requirements under 47 C.F.R. § 25.209(b). Additionally, Hughes will continue operating these earth terminals in accordance with all applicable coordination agreements.<sup>6</sup> Accordingly, there are no interference concerns with the proposed STA operations.

Hughes further requests a waiver of 47 C.F.R. § 25.120(a) to permit filing of this STA renewal application shortly after the period permitted under the rule. A waiver is warranted upon a showing of good cause, and may be granted if it would not undermine the underlying purpose of the rule and otherwise would serve the public interest.<sup>7</sup> As noted above, there are no interference concerns here, and Hughes to date has operated the subject earth terminals under STA without incident. Moreover,

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<sup>4</sup> On September 15, 2016, the FCC authorized Hughes to operate Jupiter 2 (a/k/a EchoStar XIX or Jupiter 97W), a Ka-band FSS satellite, at 97.1° W.L. *See* Hughes, Application for Operating Authority, IBFS File No. SAT-LOA-20160624-00061 (granted Sept. 15, 2016).

<sup>5</sup> *See* Hughes Modification Application, Attachment A (Technical Specifications).

<sup>6</sup> Specifically, Hughes has previously concluded a coordination agreement with Iridium, the only NGSO licensee in the 29.25-29.50 GHz frequency band. The proposed operations will comply with the coordination agreement, hence protecting Iridium's operations in the band.

<sup>7</sup> *See* 47 C.F.R. § 1.3; *WAIT Radio v. FCC*, 418 F.2d 1153, 1157 (D.C. Cir. 1969), *cert. denied*, 409 U.S. 1027 (1972); *Northeast Cellular Tel. Co., L.P. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990).

no other parties have raised any outstanding issues with the proposed operations.<sup>8</sup> Additionally, as discussed below, grant of the requested STA renewal and waiver will advance the public interest.

### **III. GRANT OF THE REQUESTED STA RENEWAL AND WAIVER WILL SERVE THE PUBLIC INTEREST**

Grant of the requested STA renewal and waiver will serve the public interest by allowing expeditious deployment of the latest technology in user terminals that will be used to provide high-speed broadband services to consumers throughout the United States. Specifically, these user terminals are being deployed to meet the broadband needs of business, government and residential users in the United States, delivering such high-demand services as access to the Internet, digital video streaming, voice over IP, digital music, interactive television, video conferencing, and high capacity two-way communications.

Hughes has deployed more than one million broadband user terminals throughout the United States and Canada, and demand continues to increase significantly with the successful launch of EchoStar XIX.<sup>9</sup> This increasing demand for high-speed broadband service demonstrates that there is an ample market for the types of broadband services that Hughes provides.<sup>10</sup> Additionally, areas of the United States that are currently underserved or unserved by terrestrial broadband technologies will benefit from the availability of these new user terminals. Deployment of these new user terminals will provide high-speed broadband service to rural and underserved areas, promote regional commerce, facilitate development of applications and content for consumers, and create new opportunities for economic development in the United States.

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<sup>8</sup> Iridium has withdrawn a prior filing raising issues regarding the coordination status of Hughes' proposed operations. *See* Letter from Joseph A. Godles, Counsel for Iridium, to Marlene H. Dortch, Secretary, FCC, IBFS File Nos. SES-MOD-20170726-00811 & SES-STA-20170721-00792 (Aug. 21, 2017).

<sup>9</sup> *See* Hughes, Press Release, *Hughes Launches World's Largest and Fastest Broadband Satellite Network* (Mar. 7, 2017).

<sup>10</sup> *See* Hughes, Press Release, *Hughes to Highlight Growth in High Throughput Satellite Technology at CSAT 2014 Conference* (Sept. 8, 2014).