

EXHIBIT 1

REQUEST FOR RENEWAL OF SPECIAL TEMPORARY AUTHORIZATION

Pursuant to Section 25.120(b)(4) of the Commission's rules,¹ EchoStar Operating L.L.C. (together with its affiliates, "EchoStar") requests renewal of its special temporary authorizations ("STAs") for an additional 30 days, until September 16, 2019, to operate five earth stations in Gilbert, AZ; Blackhawk, SD; Quicksburg, VA; Cheyenne, WY; and Summerset, SD (Call Signs E070014, E020248, E170094, E980005, and E150098) for telemetry, tracking, and command ("TT&C") communications to support the EchoStar 23 satellite's brief interim operations at 67.9° W.L. prior to its planned relocation and operations at the 72.6° W.L. orbital location.²

Launched in March 2017, EchoStar 23 is a Brazilian-licensed Ku-band Broadcasting-Satellite Service ("BSS") satellite initially authorized to operate at 44.9° W.L. Despite initial plans to operate EchoStar 23 to provide direct-to-home ("DTH") television service to Brazil, EchoStar has determined that the satellite will be better utilized at the 72.6° W.L. orbital location, in conjunction with the Canadian-licensed Nimiq 5 satellite at 72.7° W.L., to support ongoing DTH service for DISH Network, L.L.C.'s (together with its affiliates, "DISH") satellite television network. Accordingly, on July 2, 2019, EchoStar commenced moving EchoStar 23 from 44.9° W.L. to 72.6° W.L.³ for service to DISH subscribers in the United States and Canada.⁴

¹ See 47 C.F.R. § 25.120(b)(4).

² See EchoStar, Applications for STA, IBFS File Nos. SES-STA-20190711-00919, SES-STA-20190711-00920, SES-STA-20190711-00916, SES-STA-20190711-00918 & SES-STA-20190711-00917 (filed July 11, 2019). File No. SES-STA-20190711-00917 was granted on July 16, 2019.

³ EchoStar holds additional 60-day STAs to operate the same five earth stations (Call Signs E150098, E170094, E070014, E980005, and E020248) for TT&C communications with the EchoStar 23 satellite during its drift from 44.9° W.L. to 72.6° W.L. See *Satellite Communications Services Information re: Actions Taken*, Public Notice, FCC Report No. SES-02173, at 43-44 (June 19, 2019). EchoStar also has

Prior to completing the relocation of EchoStar 23 to 72.6° W.L., EchoStar seeks to operate the satellite at the 67.9° W.L. orbital location for a brief interim period until EchoStar obtains authorization from the Canadian Administration to operate at the 72.6° W.L. orbital location.⁵ Accordingly, the requested STA will allow EchoStar to operate EchoStar 23 at 67.9° W.L. for a brief interim period until Canadian authorization may be secured for operations at 72.6° W.L. EchoStar has no plans to bring into use any International Telecommunication Union filings at or near the 67.9° W. L. orbital location.

For TT&C communications with EchoStar 23 at 67.9° W.L., the subject earth stations will operate on the following frequencies, consistent with the frequency bands and other technical parameters specified under their existing licenses:

- 17.300 – 17.310 GHz and 17.791 GHz for TT&C uplinks; and
- 12.200 – 12.210 GHz for TT&C downlinks.

These earth stations have been frequency coordinated over a geostationary satellite arc that includes the 67.9° W.L. orbital location. Thus, the proposed STA operations will not cause harmful interference to other authorized operations.⁶ Nonetheless, in the unlikely event of harmful interference, EchoStar is prepared to take appropriate measures to eliminate such

pending modification applications to operate these earth stations for TT&C and feeder link communications with EchoStar 23 during its relocation and operations at 72.6° W.L. *See* EchoStar, Applications for Modification, IBFS File Nos. SES-MFS-20190308-00275 & SES-MFS-20190214-00088 *et seq.* (Mar. 8 & Feb. 14, 2019).

⁴ A modification application for blanket licensing authority to operate receive-only U.S. earth stations for reception of service from the EchoStar 23 satellite at 72.6° W.L. is currently pending. *See* DISH, Application for Modification, IBFS File No. SES-MFS-20190507-00566 (May 7, 2019).

⁵ EchoStar is aware that SES-10 operates at the 66.9° W.L. orbital location and has an arrangement with SES to ensure that its TT&C operations do not interfere with SES-10.

⁶ Additionally, the proposed STA operations are substantially consistent with Section 25.118(a)(3) of the Commission's rules, allowing earth station operators to change a satellite point of communication without prior authorization under certain circumstances when an earth station antenna is not repointed beyond the coordinated range. *See* 47 C.F.R. § 25.118(a)(3).

interference, including immediately discontinuing the interfering operations upon receiving notice of such interference.

Grant of the requested STA will serve the public interest by allowing EchoStar the flexibility to manage its satellite fleet efficiently, provide for more productive use of its satellites, and further ensure full use of spectrum and uninterrupted service from the 72.6° W.L. orbital location. Indeed, the Commission has a longstanding policy of leaving fleet management decisions to satellite operators because doing so generally serves the public interest.⁷

⁷ See *SES Americom, Inc.*, Order and Authorization, 21 FCC Rcd. 3430, 3433 ¶ 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”); *AMSC Subsidiary Corporation*, Order and Authorization, 13 FCC Rcd 12316, 12318 ¶ 8 (IB 1998) (finding that that a satellite licensee “is in a better position to determine how to tailor its system to meet the particular needs of its customers”).