

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
DISH OPERATING L.L.C.)	
)	
Application for Authority to Launch and Operate)	File No. SAT-LOA-2025 _____
EchoStar 25 at 110° W.L.)	
)	
)	

APPLICATION FOR LAUNCH AND OPERATING AUTHORITY

By this Application, DISH Operating L.L.C. (together with its affiliates, “EchoStar”) requests authority to (a) launch the EchoStar 25 satellite; (b) operate the EchoStar 25 satellite as an operational Direct Broadcast Satellite (“DBS”) service satellite at the 110° W.L. nominal orbital location; and (c) activate the communications payload without additional authority as needed.¹ By adding EchoStar 25 at 110.0° W.L., this application serves to modify EchoStar’s general DBS service authority at the nominal 110° W.L. orbital location. EchoStar requests action on this application by January 1, 2026.²

¹ The technical parameters of the satellite and its proposed operations are provided in the attached Technical Annex (Attachment 1) and associated Schedule S.

² Because the satellite will operate on the channels already licensed to EchoStar at the nominal 110° W.L. orbital location, this application would not be subject to the “freeze” on new DBS applications even if that freeze still applied. *See* Public Notice, Direct Broadcast Satellite (DBS) Auction Nullified: Commission Sets Forth Refund Procedures for Auction No. 52 Winning Bidders and Adopts a Freeze on All New DBS Service Applications, FCC 05-213, at 2 (rel. Dec. 21, 2005). In any event, however, the freeze has been lifted by the Commission, effective April 26, 2024. Amendment of the Commission’s Policies and Rules for Processing Applications in the Direct Broadcast Satellite Service, *Report and Order*, 34 FCC Rcd. 9014, 9024 ¶ 30 (2019); Information Collection Being Submitted for Review and Approval to Office of Management and Budget, FCC, 89 FR 32427 (Apr. 26, 2024).

For the reasons set forth herein, grant of this Application serves the public interest and will not cause harmful interference to any authorized user of the spectrum.

I. INTRODUCTION AND BACKGROUND

EchoStar is the operator of the DISH Network television service, the nation's third largest multichannel video programming service with millions of subscribers. To provide this service, EchoStar utilizes capacity on nine owned and leased satellites operating in the DBS and Fixed Satellite Service ("FSS") frequency bands. At the nominal 110° W.L. orbital location, EchoStar is licensed to operate over 29 of the available 32 DBS channels (specifically channels 1-27, 29, and 31).³ Currently, EchoStar provides service over these channels from the 110° W.L. cluster utilizing the EchoStar 10, EchoStar 11 (in inclined orbit), and EchoStar 23 satellites; and from the 119° W.L. cluster utilizing the EchoStar 14 and EchoStar 15 satellites. EchoStar anticipates that EchoStar 25 will be ready for launch as early as the first quarter of 2026. EchoStar anticipates that EchoStar 25, a spot-beam satellite, will take over delivery of certain programming services from EchoStar 10 and 14. After launch and in-orbit testing ("IOT"),⁴ EchoStar 25 will proceed directly to 110.0° ± 0.05° W.L. Once EchoStar 25 is placed into operation, EchoStar 10 will initially remain at 110.2° W.L. serving as an in-orbit spare and may ultimately be relocated subject to all appropriate Commission authorizations. EchoStar 14 will remain at the nominal 119° W.L. orbital location and serve as an in-orbit spare once EchoStar 25 begins service.

³ See, e.g., EchoStar Satellite Corporation, *Memorandum Opinion and Order*, 15 FCC Rcd. 6727, 6728 ¶¶ 2-3 (1999). DIRECTV holds the authorization to operate on channels 28, 30, and 32 at the nominal 110° W.L. orbital location. See United States Satellite Broadcasting Co., Inc. and DIRECTV Enterprises, Inc., *Memorandum Opinion and Order*, 14 FCC Rcd. 4585 (1999).

⁴ EchoStar may need to file for special temporary authority before launch to perform IOT from a separate orbital location.

EchoStar 25 is being manufactured by Maxar Space Systems on the manufacturer's flight-proven FS-1300 platform. The satellite will provide DBS service to CONUS, Alaska, Hawaii, Puerto Rico, and the U.S. Virgin Islands from the nominal 110° W.L. orbital location. As set forth in further detail in the Technical Appendix, it will operate within the 17.3-17.8 GHz Broadcasting Satellite Service ("BSS") feeder uplink band (ITU Appendix 30A) and the 12.2-12.7 GHz BSS downlink band (ITU Appendix 30), using the 29 channels licensed to EchoStar at the nominal 110° W.L. orbital location.⁵

The satellite will use six primary feeder link sites located in Cheyenne, Wyoming; Gilbert, Arizona; Monee, Illinois; Mount Jackson, Virginia; New Braunfels, Texas; and Spokane, Washington.⁶ Spacecraft Telemetry, Tracking and Control ("TT&C") functions will take place from FCC-authorized, fully redundant TT&C earth station and satellite control facilities located in Cheyenne, Wyoming, and Gilbert, Arizona. Consistent with Commission rules, TT&C transmissions will take place at the edges of the 17.3-17.8 GHz uplink band and 12.2-12.7 GHz downlink band for all phases of the mission.⁷ Specifically, the TT&C carrier uplink will support two flex-frequency command receivers operating at 17.300 to 17.310 GHz and 17.790 to 17.800 GHz, which are at the edges of the 17.3-17.8 GHz uplink band for all phases of the mission. The TT&C carrier downlink will use two flex-frequency transmitters operating at 12.200 to 12.210

⁵ The satellite is capable of using all 32 DBS uplink channels. However, EchoStar is not seeking authority for, and will not operate on, channels 28, 30, and 32 at the nominal 110° W.L. orbital location, since EchoStar does not hold the authorizations for these channels in the cluster.

⁶ Concurrent with this application, EchoStar is filing minor modification applications to operate seventeen transmit/receive earth stations (E980005, E980143, E980142, E070014, E020307, E010241, E150098, E050374, E080008, E080015, E080213, E080214, E080215, E080216, E120024, E120105, and E130039) to provide TT&C and feeder link communications with EchoStar 25 once it is located at 110.0° ± 0.05° W.L. These are considered minor modifications these earth stations will not be repointed beyond their coordinated range and EchoStar 25 will be serving as a replacement satellite at 110.0° ± 0.05° W.L. *See* 47 C.F.R. § 47.218(a)(3).

⁷ *See* 47 C.F.R. § 25.202(g); *see also* Technical Annex at 2.

GHz and 12.690 to 12.700 GHz, which are at the edges of the 12.2-12.7 GHz downlink band for all phases of the mission.

II. THIS APPLICATION IS TECHNICALLY AND LEGALLY COMPLETE

EchoStar hereby submits all the technical information required by Part 25 of the Commission's Rules, including Sections 25.114 and 25.148,⁸ in this narrative and the accompanying Technical Annex (Attachment A), Form 312, and Schedule S. The attached Form 312 and accompanying attachments demonstrate EchoStar's compliance with the Commission's basic legal qualifications. EchoStar holds numerous FCC satellite licenses, and its legal qualifications are a matter of record before the Commission. The Technical Annex shows that the satellite will offer DBS service to Alaska and Hawaii, in compliance with the Commission's geographic service requirements. DISH intends to operate all the transponders on EchoStar 25 on a non-broadcast, non-common carrier basis. The satellite's capacity will be used by DISH Network to provide multichannel video programming services on a subscription basis across the United States and parts of the Caribbean.

III. GRANT OF THIS APPLICATION IS IN THE PUBLIC INTEREST

EchoStar and its predecessors have been providing consumer DBS service from the nominal 110° W.L. orbital location since 1999. EchoStar 25 will be equipped with a high-power, multi-spot beam payload, allowing DISH to provide high-quality content to its customers. EchoStar believes that EchoStar 25 will be the most capable DBS satellite ever made in terms of beams provided and throughput. For example, due to its increased efficiency, EchoStar 25 will be able to consolidate two spot beam satellites into a single satellite and serve all 212 DMAs from a single satellite. EchoStar's proposed operations for EchoStar 25 at 110.0° ± 0.05° W.L.

⁸ See 47 C.F.R. §§ 25.114, 25.148.

will serve the public interest by enabling EchoStar to bring advances in satellite technology to its services; 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 nominal 110° W.L. orbital location. This is in accordance with the Commission’s longstanding policy of leaving fleet management decisions to satellite operators because doing so serves the public interest.⁹ Specifically, the Commission has determined that a satellite licensee “is in a better position to determine how to tailor its system to meet the particular needs of its customers.”¹⁰

In addition, the Commission “will generally grant a [satellite] licensee’s request to modify its system, provided there are no compelling countervailing public interest considerations.”¹¹ Here, neither the operation of EchoStar 25 at 110° ± 0.05° W.L. nor activation of its communications payload will cause harmful interference to any other authorized service. As demonstrated through the engineering analysis contained in the Technical Annex, EchoStar 25 will operate in compliance with Annex 1 to Appendices 30 and 30A of the International Telecommunication Union’s (“ITU’s”) Radio Regulations. There were initially seven (7) adjacent Region 2 BSS networks that were deemed to be affected. Canada’s networks at 129° W.L. and 138° W.L. for which EchoStar and TeleSat completed coordination in August 2017. The UK’s BERMUDASAT-1 network at 96.2° W.L. was deemed to be affected and coordination has been possible due to the large separation of the satellite networks. Holland’s

⁹ See SES Americom, Inc., *Order and Authorization*, 21 FCC Rcd. 3430, 3433 (2006) (“*SES Americom*”); AMSC Subsidiary Corporation, *Order and Authorization*, 13 FCC Rcd. 12316, 12318 (1998) (“*AMSC*”).

¹⁰ *AMSC* ¶ 8.

¹¹ *Id.*; see also *SES Americom* ¶ 8 (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[.]”).

network at 125° W.L. and the UK's networks at 105.5° W.L. and 133.5° W.L. have been suppressed by the ITU.¹²

The proposed operation of EchoStar 25 at 110.0° ± 0.05 W.L. will not create any risk of in-orbit collision.¹³ EchoStar 25 will be maintained within 110.0 ° ± 0.05° east/west station-keeping, which will ensure that its station-keeping volume will not overlap with any other satellites at the nominal 110° W.L. orbital location. EchoStar will maintain full operational control over EchoStar 25 at all times. EchoStar will coordinate all drift orbit operations and TT&C satellite transmission with other potentially affected in-orbit operators to ensure compatible non-interfering operations. In addition, EchoStar has a post-disposal mission plan that complies with Section 25.283 of the Commission's rules.¹⁴

IV. WAIVER PURSUANT TO SECTION 304 OF THE ACT

In accordance with Section 304 of the Communications Act of 1934, as amended,¹⁵ EchoStar hereby waives any claim to the use of any particular frequency or of the electromagnetic spectrum as against the regulatory power of the United States because of the previous use of the same, whether by license or otherwise.

V. CONCLUSION

For the foregoing reasons, EchoStar respectfully requests the grant of its application authority to operate EchoStar 25 at the 110.0° ± 0.05° W.L. orbital location and to activate the communications payload as needed.

¹² Technical Annex at 3.

¹³ *Id.* at 3-6.

¹⁴ *Id.* at 7-9.

¹⁵ 47 U.S.C. § 304.

Respectfully submitted,

/s/

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