

Part II Organizational Action (continued)

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ► PLEASE SEE ATTACHMENT

18 Can any resulting loss be recognized? ► PLEASE SEE ATTACHMENT

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ► PLEASE SEE ATTACHMENT

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than officer) is based on all information of which preparer has any knowledge.

Sign Here

Signature ► Milton Von Minden III Date ► 10/3/2019

Print your name ► MILTON VON MINDEN III Title ► VICE PRESIDENT, TAX

Paid Preparer Use Only	Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
	Firm's name ►			Firm's EIN ►	
	Firm's address ►			Phone no.	

ECHOSTAR CORPORATION

EIN: 26-1232727

ATTACHMENT TO IRS FORM 8937 – PART II

REPORT OF ORGANIZATIONAL ACTIONS AFFECTING BASIS OF SECURITIES

The information contained herein is being provided pursuant to the requirements of Section 6045B of the Internal Revenue Code of 1986, as amended (the “Code”), and includes a general summary regarding the application of certain U.S. federal income tax laws and regulations relating to the effects of the Distribution (as defined below) on the tax basis of shares of EchoStar Corporation (“EchoStar”) common stock and the allocation of tax basis between shares of EchoStar common stock and EchoStar BSS Corporation (“BSS”) common stock following the Distribution. The information contained herein does not constitute tax advice and does not purport to be complete or to describe the consequences that may apply to particular categories of shareholders. Neither EchoStar nor BSS provides tax advice to its shareholders. The example provided below is merely illustrative. Shareholders are urged to consult their own tax advisors regarding the particular consequences of the Distribution to them, including the applicability and effect of all U.S. federal, state and local and foreign tax laws. Shareholders are urged to read the Forms 8-K of EchoStar, as filed with the Securities and Exchange Commission on September 10, 2019 (“Form 8-K”). Shareholders may access the Forms 8-K at www.sec.gov.

Line 14 – Describe the organizational action and, if applicable, the date of the action or the date against which shareholders’ ownership is measured for the action.

On September 10, 2019 (the “Distribution Date”), EchoStar distributed to each holder of EchoStar Class A and Class B common stock (“EchoStar Common Stock”) who was entitled to receive the consideration in the transaction one share of common stock of BSS (“BSS Common Stock”) for each share of EchoStar Class A or Class B common stock held by such holder (the “Distribution”). No fractional shares of BSS Common Stock were issued. Immediately following the completion of the Distribution, a wholly owned subsidiary of DISH Network Corporation (“Dish”) merged with and into BSS (the “Merger”), with BSS continuing as a wholly owned subsidiary of Dish. As a result of the Merger, each EchoStar stockholder who was entitled to receive the consideration in the transaction received 0.23523769 shares of Dish Class A common stock (“Dish Common Stock”) for each share of BSS Common Stock they received in the Distribution. No fractional shares of Dish Common Stock were issued in the Merger, and instead, EchoStar stockholders who were entitled to receive the consideration in the transaction will receive cash in lieu of any fractional shares of Dish Common Stock.

Line 15 – Describe the quantitative effect of the organizational action on the basis of the security in the hands of a U.S. taxpayer as an adjustment per share or as a percentage of old basis.

As a result of the Distribution, EchoStar shareholders who were entitled to receive the consideration in the transaction (the “BSS Shareholders”) will be required to allocate the tax basis in each share of EchoStar Common Stock held by such shareholder between (a) the one BSS Common Share received in

the Distribution with respect to such EchoStar Common Stock and (b) the one share of EchoStar Common Stock held after the Distribution. The tax basis of a shareholder who was entitled to receive the consideration in the transaction in his or her share of EchoStar Common Stock should be allocated in proportion to the relative fair market values of EchoStar Common Stock and BSS Common Stock. Shareholders entitled to receive the consideration in the transaction must calculate their basis in each block of stock and then allocate a portion of that tax basis to the EchoStar Common Stock and BSS Common Stock received with respect thereto.

Fair market value generally is the price at which property would change hands between a willing buyer and a willing seller, neither being under any compulsion to buy or to sell and both having reasonable knowledge of the facts. U.S. federal income tax law does not specifically prescribe how a shareholder should determine the fair market values of the EchoStar Common Stock and BSS Common Stock for purposes of allocating the shareholder's tax basis. Shareholders should consult their own tax advisor to determine what measure of fair market value is appropriate.

There are several possible methods for determining the fair market values of EchoStar Common Stock and BSS Common Stock. One possible approach is to utilize the National Association of Securities Dealers Automated Quotations ("NASDAQ") market prices on the Distribution Date. For EchoStar Common Stock, the simple average market price on the Distribution Date was \$36.50 per share.

Although BSS Common Stock was not publicly traded in an open market, the simple average market price on the Distribution Date for Dish Common Stock can be used as a basis for calculating the fair market value of BSS Common Stock. The simple average market price of Dish Common Stock on the Distribution Date was \$36.77 per share. As a result, the fair market value of BSS Common Stock can be calculated to be \$8.65 per share ($\36.77×0.23523769 Exchange Ratio).

Based on the approach and the assumptions and calculations set forth in Line 16 below, 80.84% of the tax basis of a shareholder who was entitled to receive the consideration in the transaction in each share EchoStar Common Stock held would be allocated to such shareholder's share of EchoStar Common Stock that continues to be held after the Distribution, and 19.16% would be allocated to the one share of BSS Common Stock received in the Distribution. Other approaches to determine fair market value may also be possible. EchoStar shareholders are not bound by the approach described above and may, in consultation with their own tax advisor, use another approach in determining fair market values for EchoStar Common Stock and BSS Common Stock.

Line 16 – Describe the calculation of the change in basis and the data that supports the calculation, such as the market values of securities and the valuation dates.

The following is an example of how the previously described approach to basis allocation would be applied:

Assumptions:

Shares of EchoStar Common Stock owned: 1,000

EchoStar shareholder's aggregate tax basis (assumed to be \$25 per share): \$25,000

Shares of BSS Common Stock received in the Distribution (one share of BSS Common Stock issued for each share of EchoStar Common Stock held): 1,000

Tax basis allocation:

	(A)		Price	FMV of Shares Owned (Post Distribution)	(B) Percentage of Total FMV	(A) x (B) Allocated Tax Basis
	# Shares Owned	Assumed Beginning Basis				
EchoStar Corporation	1,000	\$ 25,000	\$ 36.50 ¹	\$ 36,500 ³	80.84% ⁵	\$ 20,211
EchoStar BSS Corporation	1,000		\$ 8.65 ²	\$ 8,650 ⁴	19.16% ⁶	\$ 4,789
Total				\$ 45,150	100.00%	\$ 25,000

¹ Simple average market price of EchoStar Common Stock on September 10, 2019.
² Fair market value price of EchoStar BSS Corporation common stock on September 10, 2019, determined based on the simple average market price of Dish Common Stock on September 10, 2019 (\$36.77 per share x .23523769 Exchange Ratio).
³ 1,000 shares x \$36.50
⁴ 1,000 shares x \$8.65
⁵ \$36,500/\$45,150
⁶ \$8,650/\$45,150

Line 17 – List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based.

Sections 355(a), 358(a), 358(b), 358(c), 368(a)

Line 18 – Can any resulting loss be recognized?

Generally, no gain or loss will be recognized for tax purposes as a result of the Distribution.

Line 19 – Provide any other information necessary to implement the adjustment, such as the reportable tax year.

The Distribution was completed on September 10, 2019. For EchoStar shareholders whose taxable year is the calendar year, the reportable tax year is 2019.