

EXHIBIT B

GEOGRAPHIC SERVICE REQUIREMENTS

Section 25.148(c) of the Commission's rules requires Direct Broadcast Satellite operators to provide service to Alaska and Hawaii where such service is technically feasible from the authorized orbital location, unless they can demonstrate either (1) that such service is not feasible as a technical matter, or (2) that, while technically feasible, such service would require so many compromises in satellite design and operation as to make it economically unreasonable.

As shown in Figure B-1 of Appendix B to the narrative application filed herewith, the portion of the Earth visible to DIRECTV 1R while operating at 56.16° E.L. does not include Alaska or Hawaii. Indeed, it reaches no closer to the United States than Japan and portions of China. It is therefore not technically feasible for the satellite to provide service in those states as a technical matter. Accordingly, DIRECTV submits that its operation of DIRECTV 1R at 56.16° E.L. should be excused from the geographic service requirements of Section 25.148(c).