

Juliana Villalta

From: Mindel DeLaTorre
Sent: Monday, June 04, 2012 5:24 PM
To: Juliana Villalta
Subject: FW: Nota FCC
Attachments: Nota SC a FCC_1.pdf; Certificado de Informacion.pdf

From: Fernandez Gustavo Javier [mailto:gfernandez@cnc.gov.ar]
Sent: Monday, June 04, 2012 3:00 PM
To: Mindel DeLaTorre
Cc: Robert Nelson; Stephen Duall; Paul Blais; Kathryn Medley; wwiltshire@wiltshiregrannis.com; jwengryniuk@directv.com
Subject: RV: Nota FCC

International Bureau Office (FCC):

Dear Ms. De La Torre,

I am writing to you in order to attach the presentation made by the Administration of Argentina (English and Spanish version) before the U.S. Federal Communications Commission, regarding the Comments of National Communications Commission to the File Nos. SAT-LOA-20120316-00051, and SAT-AMD-20120420-00071, submitted by DIRECTV ENTERPRISES, LLC (Application for Authorization to launch and operate DIRECTV KU-79W Space Station) .-

On behalf of the Administration of Argentina I thank you in advance for the consideration of this issue.

Cordially,

Mr. Gustavo J. FERNANDEZ
Head of the Satellite Affairs Division
International and Institutional Relations Department
National Communication Commission
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*Ministerio de Planificación Federal,
Inversión Pública y Servicios
Secretaría de Comunicaciones*

NOTA SC N° **2159 / 12**

Buenos Aires, 4 de Junio de 2012.-

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12 th Street, S.W.
Washington, D.C. 20554

**Ref: Comentarios de la Secretaría de Comunicaciones (República Argentina)
File Nos. SAT-LOA-20120316-00051, and SAT-AMD-20120420-00071.-
DIRECTV ENTERPRISES, LLC (Solicitud de Autorización para lanzar y operar
Estación Espacial DIRECTV KU-79W).**

Estimada Ms. Dortch:

Esta Secretaría de Comunicaciones de la República Argentina (Argentina) ha tomado conocimiento de la solicitud de DIRECTV Enterprises LLC (Directv o Solicitante) para lanzar y operar un satélite geoestacionario de banda Ku a 79 ° LO.

Sobre el particular, se destaca el Acuerdo de Coordinación del operador de Satélite Argentino (actualmente Empresa Argentina de Soluciones Satelitales S.A. AR-SAT) en 81° LO y SES Americom a 79° y 83° LO (firmado el 14-16 de marzo de 2007), ratificado por las administraciones de los Estados Unidos de América y la República Argentina en el Acuerdo de Coordinación del 29 de marzo de 2007, de conformidad con el procedimiento establecido por el Reglamento de Radiocomunicaciones de la Unión Internacional de Telecomunicaciones - UIT.

El mencionado Acuerdo de Coordinación establece niveles de potencia isótropa radiada equivalente (PIRE) máxima de 53 dBW respecto a las operaciones en 79.0 ° LO [ver apéndice 5, apartado 4 (condiciones específicas) del Acuerdo.]

La solicitud presentada por Directv propone operaciones que superan los límites establecidos en el Acuerdo aludido. La solicitante afirma en la página 5 de la Narrativa referida a la solicitud que: "La clase de emisión para las transmisiones en el enlace ascendente y descendente será 36M0G7W. El ancho de banda asignado para estas emisiones es de 36 MHz." Asimismo el Solicitante indica en la pagina A-2 del Narrativo, que utilizará un PIRE de 54,0 dBW/36 MHz.

En función de lo observado, Argentina señala que la solicitud de Directv debe ajustarse a los parámetros establecidos en el Acuerdo de Coordinación referido.



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Asimismo la Argentina expresa su preocupación por la propuesta de Directv sobre la apertura de la antena receptora de la red de 65 cm. Dicha apertura eleva la posibilidad de interferencia perjudicial respecto de la protección adecuada contra la interferencia de transmisiones emitidas dentro de los parámetros del Acuerdo de Coordinación. Ver apéndice 5, apartado 3 (condiciones generales) del Acuerdo.

Solicitando respetuosamente se tengan en cuenta las consideraciones anteriormente expresadas basadas en el requisito de respetar los Acuerdos suscriptos por las administraciones de ambos países y servir el interés público, la Argentina aprovecha la oportunidad para expresar su apoyo a todos los procesos de concesión de licencias y los esfuerzos que maximicen el uso eficiente de los recursos orbitales y de espectro en la región de las Américas.

Sin oto particular, saludo a Ud. con distinguida consideración.



Arq. Carlos Lisandro Salas
SECRETARIO DE COMUNICACIONES DE LA NACION

Cc:

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*Ministerio de Planificación Federal,
Inversión Pública y Servicios
Secretaría de Comunicaciones*

NOTA SC N° 2159/12

Buenos Aires, June 4, 2012.

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12 th Street, S.W.
Washington, D.C. 20554

**Re: Comments of the Communications Secretariat (Republic of Argentina) to
File Nos. SAT-LOA-20120316-00051, and SAT-AMD-20120420-00071.-
DIRECTV ENTERPRISES, LLC (Application for Authorization to launch and
operate DIRECTV KU-79W Space Station) .-**

Dear Ms. Dortch:

The Communications Secretariat of Republic of Argentina (Argentina) has noted about the request of DIRECTV Enterprises LLC (Directv or the Petitioner) to launch and operate a geostationary satellite in the Ku band at 79 ° W.L.

On this particular, we refer to the Coordination Agreement of the Argentine Satellite operator (currently Empresa Argentina de Soluciones Satelitales S.A. AR-SAT) at 81° W.L. and SES Americom at 79° and 83° W.L. (signed on March 14-16, 2007), ratified by the administrations of the United States of America and the Republic of Argentina in the Coordination Agreement dated March 29, 2007, pursuant to the procedure established by the Radio Regulations of the International Telecommunication Union - ITU.

The Agreement stipulates equivalent isotropically irradiated power (EIRP) maximum levels of 53 dBW with respect to operations at 79.0 ° W.L. (see appendix 5, paragraph 4 (specific conditions) of the Agreement).

The application submitted by Directv proposes operations that exceed the limits of the Agreement. The petitioner states in page 5 of the Narrative related to the application that: "The emission designator for transmissions in the uplink and downlink will be 36M0G7W. The allocated bandwidth for these emissions is 36 MHz." Also, the Petitioner indicates in page A-2 of the Narrative, that they intend to use an EIRP of 54.0 dBW/36 MHz.

Based on these observations, Argentina notes that the request of Directv must comply with the parameters established in the referenced Coordination Agreement.



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Also, Argentina would like to express its concern regarding Directv's proposal for a network receiving antenna aperture of 65 cm in diameter. Said aperture raises the potential for harmful interference with respect to the adequate protection against interference from transmissions made within the parameters of the Coordination Agreement. See appendix 5, paragraph 3 (general conditions) of the Agreement.

Argentina respectfully requests that the above considerations, based on the requirement to respect the Agreements subscribed by the administration of both countries and to serve the public interest, be taken into consideration. We would also like to take this opportunity to express our support for all the licensing procedures and efforts that maximize the efficient use of the orbital and spectrum resources in the Americas region.

Yours sincerely,

By: _____
Arq. Carlos Lisandro Salas
Communications Secretary
Republic of Argentina

Cc:

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DIRECTTV Enterprises, LLC
Mr. Jack M Wengryniuk
jwengryniuk@directv.com

Before the U.S. Federal Communications Commission, Washington, D.C.

Re: Comments of the Communications Secretariat (Republic of Argentina) to
File Nos. SAT-LOA-20120316-00051, and SAT-AMD-20120420-00071.-
DIRECTV ENTERPRISES, LLC (Application for Authorization to launch and
operate DIRECTV KU-79W Space Station) .-

Certificate of Service

A copy of the above Comments of the Communications Secretariat (Republic of Argentina)
has been sent via international e-mail/facsimile this June 4, 2012 to:

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