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№ 6-04/3702 от 07.11.2012

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

In the Matter of)
)
DIRECTV Enterprises, LLC)
)
Application as Amended for Authorization) File Nos. SAT-A/O-20120817-00137
to Operate DIRECTV 1R at 55.8° E.L.) SAT-AMD-20120824-00142
(S2872)) SAT-AMD-20120913-00148

COMMENTS OF THE RUSSIAN SATELLITE COMMUNICATIONS COMPANY

The Russian Satellite Communications Company ("RSCC") hereby responds to the comments of New Skies Satellites B.V. (doing business as "SES") on the above-captioned application of DIRECTV Enterprises, LLC ("DIRECTV"), as amended, for Commission authority to operate the DIRECTV 1R satellite (call sign S2872) at 304.2° W.L. (55.8° E.L.). As the Commission is aware, RSCC wishes to utilize the DIRECTV 1R satellite temporarily to accommodate certain customers currently operating on RSCC's Bonum 1 satellite at 56° E.L. until the launch of Bonum 1's replacement.¹

DIRECTV 1R will operate in the downlink frequencies 12.2-12.5 GHz. RSCC understands that operation of NSS-12 in the overlapping band 12.25-12.50 GHz is limited to the coverage in Figure 1 below.

¹ The replacement satellite – Express-AT1 -- is expected to begin commercial service late next year.,

Figure 2 presents downlink EIRP contours for the Bonum 1 satellite currently operating at 56° E.L. and three representative downlink EIRP contours of the DIRECTV 1R satellite (52 dBW; 50 dBW; 47.8 dBW). Figure 2 also shows in green the territory of India where NSS-12 service is being provided.

It can be concluded from Figure 2 that the downlink EIRP values of the Bonum 1 and DIRECTV 1R satellites (both assumed to be operating at saturation) are very similar. As no interference from the Bonum 1 satellite to NSS-12 receive earth stations in India has been observed after several years of simultaneous operation, RSCC is of the view that the likelihood of DIRECTV 1R producing unacceptable interference to NSS-12 receive earth stations in India is very low.



Figure 1. Downlink EIRP contours of the NSS-12 satellite in the band 12.25-12.50 GHz.

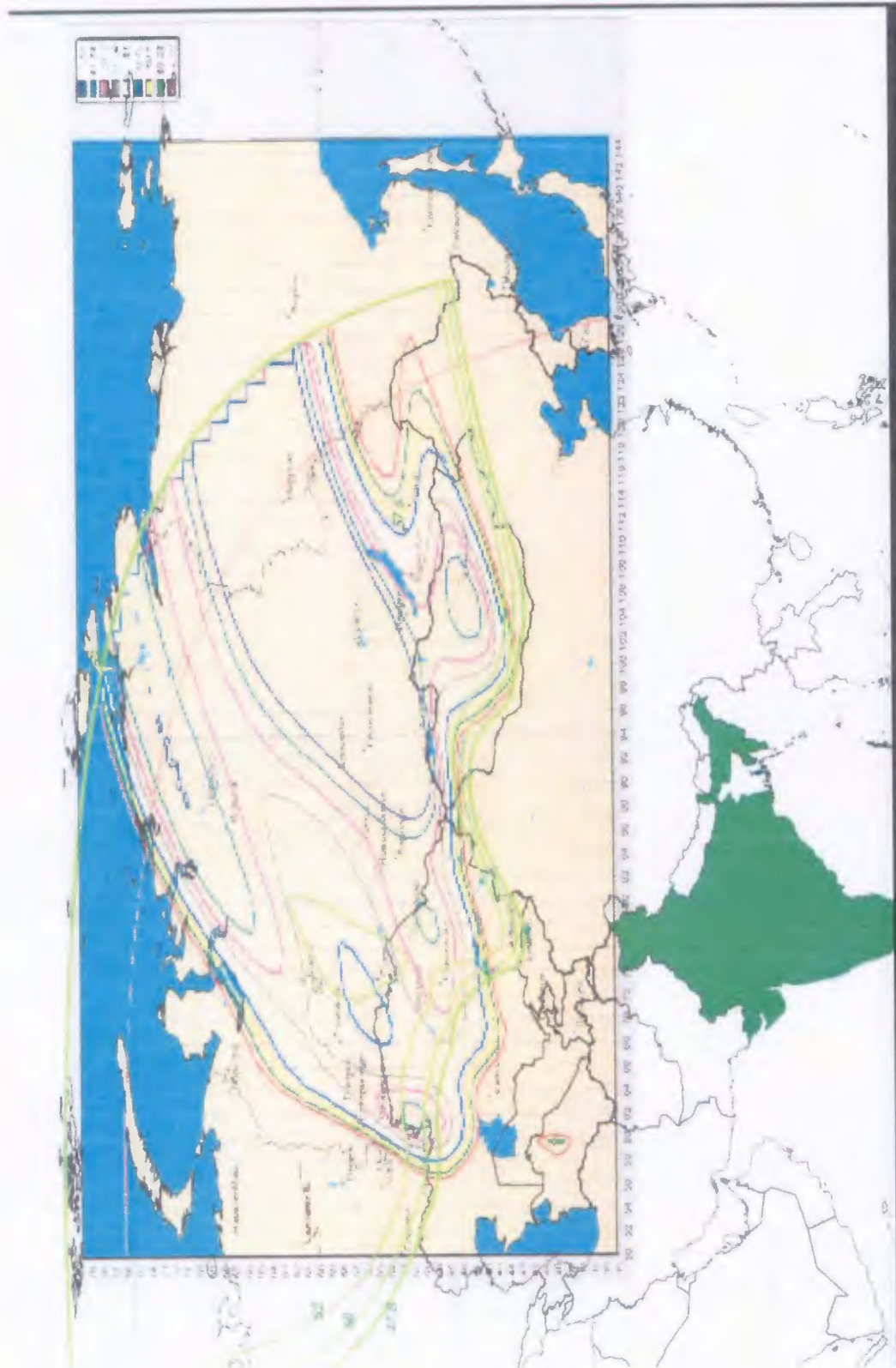


Figure 2. Downlink EIRP contours of the DTVIR satellite (52 dBW; 50 dBW; and 47.8 dBW) superimposed to the downlink EIRP contours of the Bonum 1 satellite.

Moreover, RSCC understands that the FCC will authorize DIRECTV 1R to operate on a non-interference, non-protected basis. Therefore, RSCC believes that authorization for operation of DIRECTV 1R at 55.8° E.L. should be granted so that RSCC can ensure service continuity pending the launch of Bonum 1's replacement satellite.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'Yuri Prokhorov', is written over a horizontal line. The signature is stylized and extends to the right of the line.

Yuri Prokhorov
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November 07, 2012

CERTIFICATE OF SERVICE

I, Pam Conley, do hereby certify that on November 13, 2012, I served a true and correct copy of the Comments of the Russian Satellite Company by first-class mail on the following:

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