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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

DIRECTV Enterprises, Inc.
Application to Launch and Operate
a Direct Broadcast Satellite Service
Space Station

Satellite Policy Branch
International BSS

File No. SAT-LOA-20010518-00045

**TELESAT CANADA REPLY TO
EX PARTE RESPONSE OF DIRECTV ENTERPRISES, INC.**

Telesat Canada ("Telesat"), by its attorneys, files this reply to the *ex parte* response of DIRECTV Enterprises, Inc. ("DIRECTV") to correct two factual inaccuracies.¹

First, DIRECTV's belief that coordination with Telesat is an optional goodwill gesture is plainly wrong.² The International Telecommunication Union ("ITU") rules require DIRECTV to coordinate the DIRECTV 4S satellite with Canadian systems. This obligation is reflected in the *DIRECTV 4S Order* and DIRECTV's own application.³ DIRECTV's August 14, 2001 amendment does not alter this international requirement.

¹ Telesat simultaneously is filing a request for dismissal of DIRECTV's *ex parte* response or, alternatively, approval to file this reply.

² *Ex Parte Response of DIRECTV Enterprises, Inc.* at 1-2 (filed Jan. 28, 2002).

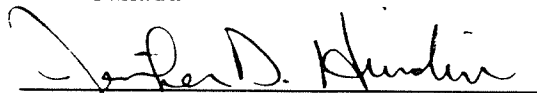
³ *DIRECTV 4S Order*, 2001 FCC LEXIS 5801, DA 01-2402, ¶ 6 (Oct. 26, 2001) (noting that the "technical parameters of DIRECTV's DBS system vary from those set forth for U.S. assignments in the Region 2 broadcasting satellite service (BSS) plans and its associated Feeder Link Plan"); *DIRECTV Application for Authority to Launch and Operate DIRECTV 4S (USABBS-13)*, at 4, section III (filed May 18, 2001) ("[i]nterference analyses performed in accordance with ITU Radio Regulations Appendices S30 and S30A determined that coordination with Canada and Mexico is required per Section 2 of Annex 1 of Appendix S30").

Second, DIRECTV's amendment to the DIRECTV 4S application was not filed on the "same day" nor in response to Telesat's email providing a compromise coordination solution or suggesting that coordination be turned over to the administrations.⁴ In fact, DIRECTV filed its amendment on August 14, 2001, three days before Telesat sent its coordination email on August 17, 2001.

Respectfully submitted,

Telesat Canada

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February 8, 2002

⁴ *Ex Parte Response of DIRECTV Enterprises, Inc.* at 2-3. and Exhibit 1.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing **Reply** was delivered via first-class mail, on this 8th day of February 2002 to each of the following:

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