

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

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JAN 20 2006

Federal Communications Commission
Office of Secretary

Application of)

**ECHOSTAR SATELLITE OPERATING)
COMPANY)**

For Modification of Authorization to)
Operate a DBS Satellite at 110° W.L.)

File No. SAT-MOD-20051221-00267

Received

JAN 24 2006

Policy Branch
International Bureau

COMMENTS OF DIRECTV ENTERPRISES, LLC

DIRECTV Enterprises, LLC ("DIRECTV") hereby comments on the application filed by EchoStar Satellite Operating Company ("EchoStar") for modification of its authorization to operate a satellite in the Direct Broadcast Satellite ("DBS") service at the 110° W.L. orbital location to cover its EchoStar 10 space station. DIRECTV operates its own DBS satellite, DIRECTV 5, at the 109.8° W.L. orbital location, and has additional DBS satellites at the nominal 101° W.L. and 119° W.L. positions as well.

DIRECTV has analyzed the potential interference that would result from the proposed operation of EchoStar 10 on all of its DBS satellites. Given the large number of high-power spot beams on EchoStar 10 serving areas throughout the entire continental United States, DIRECTV has concluded that its customers in many areas of the country will receive unacceptable interference. Not surprisingly, the most serious cases of interference would affect service from DIRECTV 5, located just 0.2° away from EchoStar 10. DIRECTV 5 operates on DBS channels 28, 30, and 32, which overlap in

frequency but are cross-polarized from DBS channels 27, 29, and 31 on which EchoStar 10 will operate.


Due to the proximity of orbital locations, the only protection for DIRECTV consumers from cross-polarization interference is the isolation provided by the receive terminals, which typically affords 20-25 dB rejection. Given the large EIRP disparity between the operational levels requested for EchoStar 10 and the levels actually provided by DIRECTV 5 – as much as 10 dB less in many cases – C/I values would range from about 12 dB to 19 dB, which is insufficient to provide adequate protection. As a result, consumers receiving service from DIRECTV 5 would suffer reduced service availability, which means that they would experience more frequent and prolonged rain outages.

DIRECTV and EchoStar are currently exploring various operational alternatives that could address this issue. While both parties are working diligently to come to terms, no agreement has been reached to date. DIRECTV remains hopeful that the parties will be able to come to an acceptable accommodation. Absent such an agreement, however, DIRECTV feels compelled to state its concern with respect to the operational parameters proposed for EchoStar 10 in the pending application.

Accordingly, DIRECTV requests that the Commission hold this application in abeyance until the interference issues are resolved.

Respectfully submitted,

DIRECTV ENTERPRISES, LLC

By: 
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Counsel for DIRECTV Enterprises, LLC

Dated: January 20, 2006

ENGINEERING CERTIFICATION

The undersigned hereby certifies to the Federal Communications Commission as follows:

- (i) I am the technically qualified person responsible for the engineering information contained in the foregoing Comments,
- (ii) I am familiar with Part 25 of the Commission's Rules, and
- (iii) I have either prepared or reviewed the engineering information contained in the foregoing Comments, and it is complete and accurate to the best of my knowledge and belief.

Signed:

/s/

David Pattillo

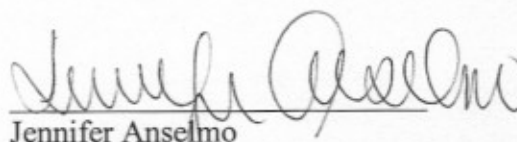
January 20, 2006

Date

CERTIFICATE OF SERVICE

I hereby certify that, on this 20th day of January, 2006, a copy of the foregoing
Comments of DIRECTV Enterprises, LLC was served by hand delivery upon:

Pantelis Michalopoulos
Steptoe & Johnson LLP
1330 Connecticut Avenue, N.W.
Washington, DC 20036


Jennifer Anselmo