



December 2, 2009

**BY ELECTRONIC FILING**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, DC 20554

Re: *IBFS File No. SAT-LOA-20090807-00086 (S2797)*

Dear Ms. Dortch:

In response to inquiries from the Commission staff, DIRECTV Enterprises, LLC (“DIRECTV”) submits two minor clarifications with respect to the above referenced application for authority to launch and operate the DIRECTV 12 Ka-band satellite.

First, DIRECTV recognizes that, as provided in Section 25.145(g) of the Commission’s rules, the operations of DIRECTV 12 in the 18.3-18.8 GHz band are not entitled to protection from the co-primary operations of terrestrial fixed service systems until after the period during which terrestrial stations remain co-primary has expired. Because DIRECTV 12 will operate within the power flux-density limits established in Section 25.208(c) of the Commission’s rules, the satellite’s operations will have no harmful effect on such terrestrial stations and no further coordination is required.<sup>1</sup>

Second, DIRECTV 12 is a partial replacement for two existing satellites currently operating at the nominal 103° W.L. orbital location. Specifically, DIRECTV 12 will replace the spot beam payload operating in the 18.3-18.8 GHz band on the DIRECTV 10 satellite, and will also replace that portion of the CONUS payload operating in the 19.87-20.2 GHz band on the SPACEWAY 1 satellite. Because DIRECTV 12 will operate at the same nominal orbital location and in frequencies already authorized for DIRECTV’s existing operations, the satellite should be deemed to be a partial replacement. DIRECTV will continue the operations of DIRECTV 10 and SPACEWAY 1 until DIRECTV 12 arrives on station to replace portions of those operations, and will take measures to ensure that the transition of service among the satellites is as seamless to subscribers as possible.

---

<sup>1</sup> See *Redesignation of the 17.7-19.7 GHz Frequency Band*, 16 FCC Rcd. 19808, ¶ 52 (2001) (“the pfd values in place were already designed to ‘pre-coordinate’ spacecraft transmissions and terrestrial fixed service receivers regardless of the elevation angle and azimuth of the terrestrial receiver” and were adopted “to avoid the need for FS/FSS coordination”).

**WILTSHIRE & GRANNIS LLP**

Marlene H. Dortch  
December 2, 2009  
Page 2 of 2

If you have any questions, please do not hesitate to contact me.

Respectfully submitted,

/s/

William M. Wiltshire  
*Counsel to DIRECTV Enterprises, LLC*

cc: Andrea Kelly  
Kathryn Medley