



September 12, 2012

BY ELECTRONIC FILING

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

Re: *IBFS File No. SAT-LOA-20120518-00085 (S2869)*

Dear Ms. Dortch:

In the above referenced proceeding, DIRECTV Enterprises, LLC (“DIRECTV”) has requested a waiver of Section 25.202(g) of the Commission’s rules such that it could conduct TT&C functions for DIRECTV 14 at the edges a portion of the allocated Ka-band frequency bands (*i.e.*, the upper edge of the 18.3-18.8 GHz and lower edge of the 28.35-28.6 GHz bands) even though these bands are not contiguous with the portion of the Ka-band that DIRECTV 14 will use for communications links (*i.e.*, the 19.7-20.2 GHz/29.5-30.0 GHz portions of these bands). In that waiver request DIRECTV stated that operating TT&C for this satellite outside of the frequency bands in which it would be supporting communications signals but within the bands already authorized for use by DIRECTV at the requested orbital location would “allow DIRECTV to better integrate the TT&C frequencies for DIRECTV 14 with its existing infrastructure.” This letter further elaborates upon the basis for the requested waiver.

DIRECTV 14 will be co-located with both SPACEWAY 2 and DIRECTV 11 at the nominal 99° W.L. orbital location, resulting in congestion at the available band edges. The SPACEWAY 2 satellite has multiple command frequencies in the lower portion of the 29.5-30.0 GHz band, while DIRECTV 14 incorporates a Radio Frequency Autotrack (RFAT) system (used to maintain proper pointing of the multiple spot beams on the satellite) in the upper portion of this frequency band. DIRECTV 11 has multiple command frequencies in the upper and lower edges of the 29.25-29.5 GHz band. Thus, in order to avoid any potential for interference between signals from different co-located satellites, and given that DIRECTV is the only operator authorized to use the other portions of the Ka-band at this location, it was decided that the safest and most reliable solution for DIRECTV 14 was to place its TT&C at the edges of that portion of the Ka-band that is least congested with TT&C signals at this orbital location. Thus, grant of the requested waiver would promote sound satellite operations without detracting in any way from sound spectrum management.

Respectfully submitted,

/s/

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WILTSHIRE & GRANNIS LLP

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cc: Kathryn Medley
Kal Krautkramer