

June 25, 2013

BY ELECTRONIC FILING

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: ***Response to Informal Comments of SES Satellites (Gibraltar) Ltd.***
IBFS File No. SAT-LOA-20130205-00016

Dear Ms. Dortch:

SES Satellites (Gibraltar) Limited (“SES”) recently filed informal comments raising certain questions about DIRECTV Enterprises, LLC’s above referenced application for authority to operate a Ku-band space station at the 45.2° W.L. orbital location.¹ In particular, SES asserts that DIRECTV failed to provide a sufficient interference analysis as required under Section 25.140(b)(2) of the Commission’s rules because it did not demonstrate the compatibility of its proposed system with SES’s NSS-703 satellite at the 47.05° W.L. location. As demonstrated below, SES’s argument confuses the domestic and international coordination processes, and should therefore be rejected.

Section 25.140(b)(2) requires each applicant for a space station authorization in the Fixed-Satellite Service to provide an interference analysis to demonstrate the compatibility of its proposed system two degrees from any authorized space station. In its application, DIRECTV provided an interference analysis of three U.S.-authorized space stations operating or proposed to operate within two degrees of its proposed location (INTELSAT-9, -11, and -14). Because those satellites are fully subject to the Commission’s licensing process, their operational characteristics are both defined and publicly available, allowing DIRECTV to perform the necessary analysis. DIRECTV also provided an analysis to demonstrate uplink and downlink compatibility with hypothetical adjacent co-frequency/co-coverage satellites operated two degrees away.²

¹ See Letter from Karis A. Hastings to Marlene H. Dortch, IBFS File No. SAT-LOA-20130205-00016 (Jun. 18, 2013).

² See Application Narrative, IBFS File No. SAT-LOA-20130205-00016, at 12-18. That showing is consistent with the International Bureau guidance cited by SES. See *Clarification of 47 C.F.R. § 25.140(b)(2)*, 19 FCC Rcd. 10652 (IB 2004).

Marlene H. Dortch

June 25, 2013

Page 2 of 2

In October 2011, the Commission authorized NSS-703 to provide service in the United States. As SES's application in that proceeding makes clear, "[o]nly one spot beam (Spot 2) has coverage of the United States and, thus, is the only Ku-band beam that is relevant to this petition."³ Accordingly, the only Ku-band aspect of this satellite actually authorized by the Commission necessarily relates to the spot beam (Spot 2) identified by SES.

The downlink and uplink antenna beam contours for Spot 2 are shown in Figures B-22 and B-25 from the SES Petition (reproduced as attachments hereto). These figures make clear that Brazil is outside of the -30 dB contour of this beam. Given that DIRECTV's proposed satellite would only operate within Brazil, there is no interference concern with NSS-703, in the context of Section 25.140(b)(2), on this lone authorized beam.

According to the SES Petition, there are two other Ku-band steerable beams on NSS-703. However, because that satellite is licensed by Gibraltar and those additional beams are not the subject of any Commission authorization, it is not clear how, or whether, they are authorized to operate.⁴ That is the subject for international coordination under the well-defined procedures of the International Telecommunications Union – a process in which DIRECTV fully intends to engage once it has been licensed by the Commission. DIRECTV's application demonstrates that the proposed satellite can be expected to be compatible with space stations operating co-coverage in the same frequency bands as close as two degrees away, so such coordination should be achievable. At this point, however, DIRECTV cannot be expected to demonstrate compatibility with the unknown operating parameters of every adjacent satellite licensed by another administration, and Section 25.140(b)(2) does not require such a demonstration.

Sincerely yours,

/s/

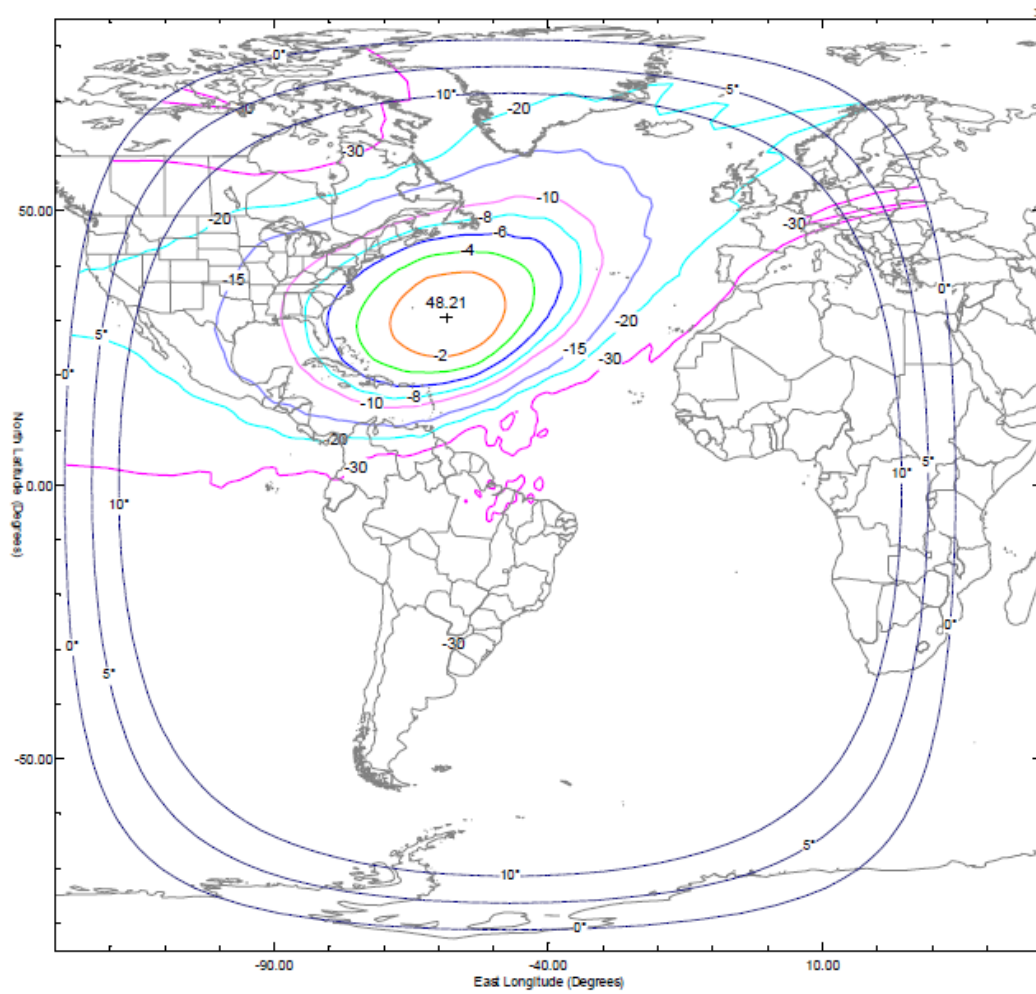
William M. Wiltshire
Counsel for DIRECTV Enterprises, LLC

Attachments

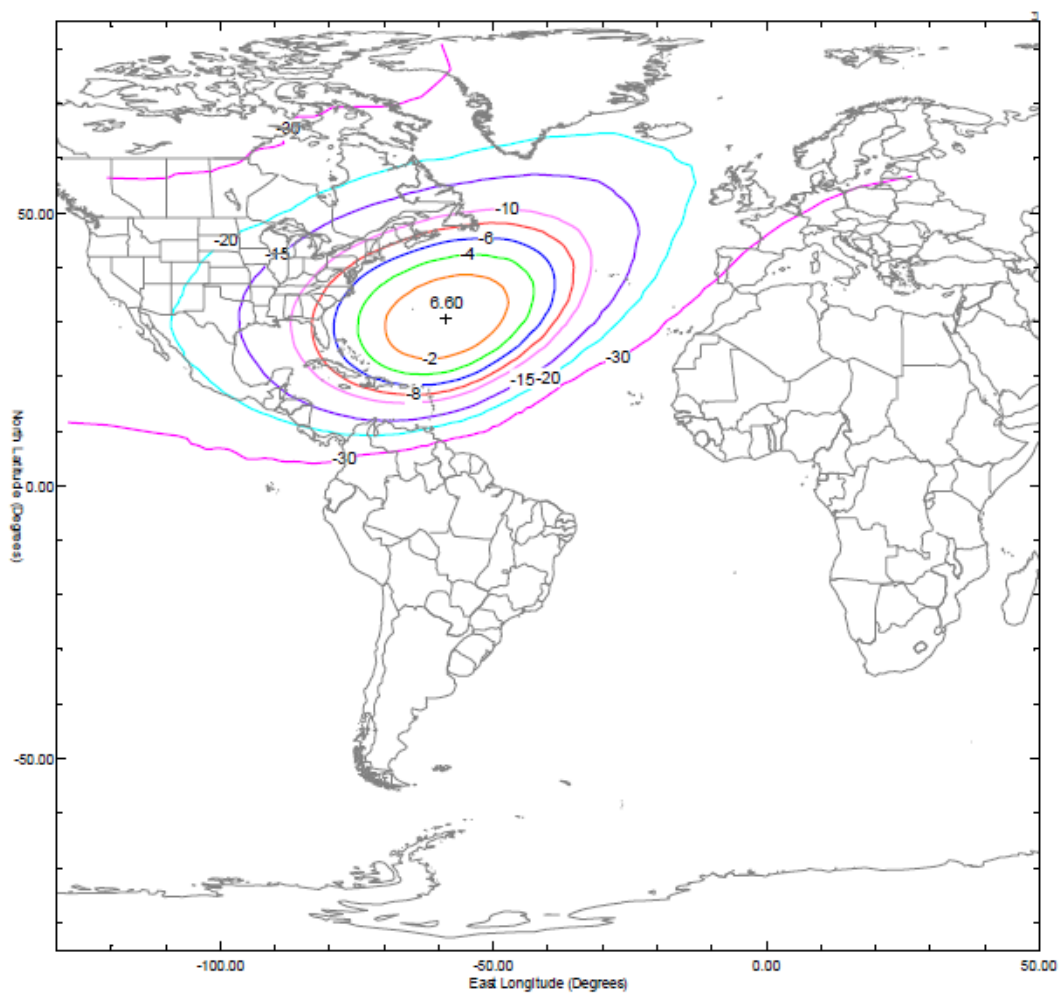
cc: Stephen Duall (International Bureau)
Karis A. Hastings (Counsel for SES Satellites (Gibraltar) Limited)
Jennifer D. Hindin (Counsel for Intelsat License LLC)

³ See Technical Appendix for NSS-703, IBFS File No. SAT-PPL-20101103-00230, at 3 (filed Nov. 3, 2010) ("SES Petition").

⁴ DIRECTV notes that there is no indication that NSS-703 has been authorized by Brazilian authorities to provide service in that country.



SES Figure B-22. Ku-Band Spot 2 Downlink Beam



SES Figure B-25. Ku-Band Spot 2 Uplink Beam