

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

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<i>Application of</i>	)	
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<b>DIRECTV ENTERPRISES, LLC</b>	)	File No. SAT-LOA-20130205-00016
	)	
For Authorization to Launch and	)	
Operate DIRECTV KU-45W, a	)	
Ku-Band Space Station, at 45° WL	)	
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**RESPONSE OF DIRECTV ENTERPRISES, LLC**

DIRECTV Enterprises, LLC (“DIRECTV”) hereby responds to the Petition to Deny filed by Intelsat License LLC (“Intelsat”).<sup>1</sup> In this proceeding, DIRECTV seeks authority to launch and operate a Ku-band satellite operating at the nominal 45° W.L. orbital location using the 10.95-11.2 GHz, 11.45-11.7 GHz, and 11.95-12.2 GHz downlink and 14.0-14.5 GHz uplink frequency bands. In its application, DIRECTV provided an extensive analysis to demonstrate that its proposed operations would be compatible with the operations of Intelsat’s existing satellite at 45° W.L. (Intelsat 14) and its two existing satellites at 43° W.L. (Intelsat 9 and Intelsat 11).<sup>2</sup> DIRECTV did not, however, address the potential impact of its proposed system on Intelsat’s operations of Galaxy 11, which is the subject of a prior-filed application seeking modification to

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<sup>1</sup> See Petition to Deny of Intelsat License LLC, IBFS File No. SAT-LOA-20130205-00016 (filed May 6, 2013) (“Intelsat Petition”).

<sup>2</sup> See Application for Authorization to Launch and Operate DIRECTV KU-45W, IBFS File No. SAT-LOA-20130205-00016, Sections 10 and 17, Appendix D (filed Feb. 5, 2013).

relocate to 45° W.L. Intelsat's Petition is based on the potential for harmful interference in the overlapping frequencies in which both Galaxy 11 and DIRECTV KU-45 would provide coverage to the same area from this orbital location.

DIRECTV recognizes that, under the Commission's first-come first-served processing rules, Intelsat's Galaxy 11 application has precedence over DIRECTV's application,<sup>3</sup> and that DIRECTV's co-coverage, co-frequency operations at 45° W.L. creates a risk of harmful interference to Galaxy 11's operations at this same slot. In light of these facts, DIRECTV has actively engaged Intelsat in an effort to reach a coordination agreement under which both satellites could operate at the nominal 45° W.L. location.

The parties have made considerable progress in this regard, and DIRECTV is optimistic that an operator-to-operator agreement will be concluded in the near future. Once the coordination process has reached its conclusion, DIRECTV will so inform the Commission and, if necessary, amend its application to reflect the outcome. DIRECTV requests that the Commission hold its application in abeyance during the brief period required for completion of the ongoing coordination process.

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<sup>3</sup> See 47 C.F.R. § 25.158(b).

Respectfully submitted,  
**DIRECTV ENTERPRISES, LLC**

By:       /s/        
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