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DIRECTV
Received

APR 30 2003

Policy Branch
International Bureau

Thomas Tycz
Chief, Satellite Division
International Bureau
Federal Communication Commission
445 12th Street, SW
Washington, DC 20554

Re: File Nos. SAT-STA-20020910-00172 P; SAT-MOD-20030205-00032

Dear Mr. Tycz:

As you know, pursuant to a grant of Special Temporary Authority in September 2002, DIRECTV moved its DIRECTV 3 satellite out of geostationary orbit into a storage orbit. DIRECTV has pending a minor modification application to reflect this change to its DBS system.

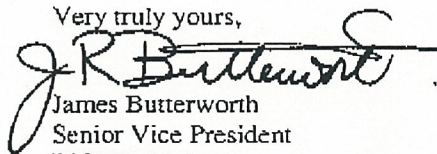
The primary reason that DIRECTV sought FCC consent to move DIRECTV 3 was the failure of the main spacecraft control processor ("SCP") on that satellite. The satellite remains fully capable of DBS operation due to the presence of a backup SCP, although DIRECTV decided it prudent to move the satellite out of the 101 degree W.L. orbital location since it was only needed as a backup at the time.

DIRECTV stands by this business decision. However, DIRECTV wishes to clarify for the record its view that the Commission should not over-emphasize concerns regarding a lack of SCP redundancy to the point where fully operational satellites, in which hundreds of millions of dollars have been invested, are effectively rendered useless for reasons unrelated to the actual capabilities of the satellite. For example, DIRECTV 3 remains an important source of emergency backup capacity, which DIRECTV (and, presumably, the Commission) would want to see utilized in the event of a catastrophic failure of one of its in-orbit satellites. Furthermore, we and the manufacturer of the satellites suffering SCP failures, believe that the risk of failure caused by "tin whiskers" decreases after a period of time since manufacture or launch, a point that DIRECTV3 has passed.

In fact, there are other satellites with a lack of SCP redundancy currently operating in the geostationary arc whose capacity is vital to meeting existing service needs. The public interest is, nonetheless, furthered by the operation of these spacecraft. We therefore do not wish to suggest that an SCP failure should preclude valuable uses of operational satellites that can serve and enhance the public interest.

Thank you for your consideration and the opportunity to clarify DIRECTV's views on this point.

Very truly yours,


James Butterworth
Senior Vice President
DIRECTV, Inc.

cc: James H. Barker, Esq.

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