

**HARRIS,
WILTSHIRE &
GRANNIS LLP**

Received

JAN 06 2005

Policy Branch
International Bureau

1200 EIGHTEENTH STREET, NW
WASHINGTON, DC 20036

TEL 202.730.1300 FAX 202.730.1301
WWW.HARRISWILTSHIRE.COM

ATTORNEYS AT LAW

December 28, 2004

RECEIVED

DEC 28 2004

Federal Communications Commission
Office of Secretary

BY HAND DELIVERY

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

Re: Collision Avoidance Statements
SAT-MOD-20040614-00113
SAT-MOD-20040614-00114
SAT-MOD-20040630-00128
SAT-RPL-20040630-00127

Int'l Bureau

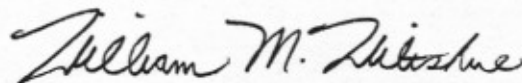
JAN 04 2005

Front Office

Dear Ms. Dortch:

On November 4, 2004, the International Bureau granted the above referenced satellite authorizations to The DIRECTV Group, Inc and DIRECTV Enterprises, LLC. Each of those authorizations included a condition requiring the submission of a collision avoidance statement for the assigned orbital location. In satisfaction of those conditions, enclosed you will find the required statements for the 99° W.L., 101° W.L., and 103° W.L. orbital locations.

Sincerely yours,



William M. Wiltshire
Counsel for The DIRECTV Group, Inc.
and DIRECTV Enterprises, LLC

Enclosures

cc: Selina Khan

COLLISION AVOIDANCE STATEMENT FOR SPACEWAY-2 AT 99° W.L.

DIRECTV has reviewed the list of licensed systems and systems that are under consideration by the FCC for the 99° W.L. orbital location. In order to address non-U.S. licensed systems, DIRECTV has reviewed the list of satellite networks in the vicinity of 99° W.L. for which a request for coordination has been submitted to the ITU. Only those networks that are operating or planned to be operated within $\pm 0.2^\circ$ of 99° W.L. have been taken into account in this review.

This review has determined that only one other system has been licensed by the FCC for operation at 99° W.L. That system is GALAXY IV(R), which is currently in operation. No other U.S. systems are currently under consideration for licensing by the FCC for this location. Internationally, Canada, France, and United Kingdom have filed coordination requests for satellite networks at this orbital location.¹ DIRECTV can find no evidence that satellite construction contracts have been awarded for any of these networks, and we note that the FAA Commercial Space Station Second Quarter 2004 Report shows no pending launch for any of these networks.

Physical coordination of SPACEWAY-2 with the GALAXY IV(R) network will be required. DIRECTV has contacted the operator of GALAXY IV(R) and confirmed that this satellite is being station kept at 99.0° W.L. $\pm 0.05^\circ$. DIRECTV is authorized for an orbital position of 99.05° W.L. $\pm 0.05^\circ$. This would normally create a potential overlap of the station keeping volumes of these two satellites. However, DIRECTV intends to operate the SPACEWAY-2 satellite with a station keeping tolerance $\pm 0.025^\circ$ centered at a nominal orbital longitude of 99.075° W.L. In this way the SPACEWAY-2 satellite will

¹ Note that, although the administration of Luxemburg filed an API at the ITU for a satellite network at 98.8° W.L., this API was followed by a coordination request that moved the filed location for this network to 101° W.L., as is contemplated under RR 9.2 (MOD WRC-03).

be maintained within its currently authorized orbital position without resulting in a station
keeping volume overlap with GALAXY IV(R).

COLLISION AVOIDANCE STATEMENT FOR DIRECTV 8 AT 101° W.L.

DIRECTV has reviewed the list of licensed systems, and systems that are under consideration by the FCC for the 101° W.L. orbital location. In order to address non-U.S. licensed systems, DIRECTV has reviewed the list of satellite networks in the vicinity of 101° W.L. for which a request for coordination has been submitted to the ITU. Only those networks that are operating or planned to be operated within $\pm 0.2^\circ$ of 101° W.L. have been taken into account in this review.

This review has determined that six other systems have been licensed by the FCC for, and are currently operating at, 101° W.L. Those systems are AMSC-1, AMC-4, DIRECTV 1, DIRECTV 1R, DIRECTV 2, and DIRECTV 4S. In addition, the Commission currently has pending applications from (1) Mobile Satellite Ventures (MSV), for a replacement satellite for AMSC-1, (2) Echostar, for a satellite to operate in the extended Ku-band, and (3) DIRECTV and Pegasus, to operate satellites in the BSS reverse band when it becomes available in 2007. Internationally, United Kingdom, France and Luxemburg have filed coordination requests with the ITU for satellite networks at this orbital location. Other than the replacement satellite for MSV, DIRECTV can find no evidence that satellite construction contracts have been awarded for any of these networks, and we note that the FAA Commercial Space Station Second Quarter 2004 Report shows no pending launch for any of these networks.

Physical coordination of DIRECTV 8 with the AMC-4, AMSC-1, the MSV replacement satellite, and with the other satellites in the DIRECTV network will be required. Under the current circumstances, the six satellites operating at the nominal 101° W.L. orbital position actually operate slightly offset from that position, and the four

DIRECTV satellites at that location are operated such that there is no overlap of their station keeping volumes with those of AMC-4 and AMSC-1. The physical coordination of the DIRECTV satellites amongst themselves is done entirely within DIRECTV. As explained in the DIRECTV 8 application, DIRECTV 8 will replace the DIRECTV 2 satellite currently operating at 101° W.L., and DIRECTV 2 will be moved outside the cluster at this slot, thereby making space for DIRECTV 8. Thus, the launch of DIRECTV 8 will have no net impact on the number of satellites that DIRECTV internally coordinates at this location.

COLLISION AVOIDANCE STATEMENT FOR SPACEWAY-1 AT 103° W.L.

DIRECTV has reviewed the list of licensed systems and systems that are under consideration by the FCC for the 103° W.L. orbital location. In order to address non-U.S. licensed systems, DIRECTV has reviewed the list of satellite networks in the vicinity of 103° W.L. for which a request for coordination has been submitted to the ITU. Only those networks that are operating or are planned to be operated, within $\pm 0.2^\circ$ of 103° W.L. have been taken into account in this review.

This review has determined that only one other system has been licensed by the FCC for operation at 103° W.L. That system is AMC-1, which is currently in operation. No other U.S. systems are currently under consideration for licensing by the FCC for this location. Internationally, Canada, Tonga, and United Kingdom have filed coordination requests for satellite networks at this orbital location. DIRECTV can find no evidence that satellite construction contracts have been awarded for any of these networks, and we note that the FAA Commercial Space Station Second Quarter 2004 Report shows no pending launch for any of these networks.

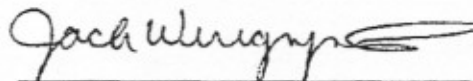
Physical coordination of SPACEWAY-1 with the AMC-1 network will be required. DIRECTV is authorized for an orbital position of 103.05° W.L. $\pm 0.05^\circ$. DIRECTV intends to operate the SPACEWAY-1 satellite with a station keeping tolerance $\pm 0.025^\circ$ centered at a nominal orbital longitude of 103.075° W.L. In this way the SPACEWAY-1 satellite will be maintained within its currently authorized orbital position without resulting in a station keeping volume overlap with AMC-1, nominally located at 103.0° W.L., assuming a standard station keeping tolerance of $\pm 0.05^\circ$ for the AMC-1 spacecraft.

ENGINEERING CERTIFICATION

The undersigned hereby certifies to the Federal Communications Commission as follows:

- (i) He is the technically qualified person responsible for the engineering information contained in the foregoing Collision Avoidance Declarations for SPACEWAY 1, SPACEWAY 2, and DIRECTV 8,
- (ii) He is familiar with Part 25 of the Commission's Rules, and
- (iii) He has either prepared or reviewed the engineering information contained in the foregoing Collision Avoidance Declarations, and it is complete and accurate to the best of his knowledge and belief.

Signed:



Jack Wengryniuk
Senior Director
DIRECTV Operations Inc.

December 23, 2004

Date