



Federal Communications Commission
Washington, D.C. 20554

May 2, 2012

William M. Wiltshire, Esq.
Wiltshire & Grannis, LLP
1200 18th Street, N.W.
Washington, DC 20006

Re: DIRECTV Enterprises, LLC
IBFS File No. SAT-MOD-20120314-00042
(Call Sign: S2796)

Dear Mr. Wiltshire:

On March 14, 2012 DIRECTV Enterprises, LLC (DIRECTV) filed an application to modify its license for a 17/24 GHz Broadcasting-Satellite Service (BSS) space station, Call Sign: S2796. In its application, DIRECTV seeks to conform its authorization to the technical and information requirements adopted by the Commission in the *17/24 GHz BSS Second Report and Order*.¹ Pursuant to Section 25.111(a) of the Commission's rules,² we request that DIRECTV provide, by amendment, additional information to facilitate the processing of the application.

Section 25.264(a) of our rules requires that 17/24 GHz BSS authorization holders provide predicted antenna off-axis gain information for each transmitting antenna in the 17.3-17.8 GHz band.³ Section 25.264(c) requires that authorization holders subsequently confirm those predictions with measured data.⁴ In its modification, DIRECTV requests a waiver of these requirements, arguing that it did not perform either the antenna off-axis gain predictions or measurements prior to launch and has no practicable way to provide this information now that the satellite is in space.⁵ In addition, DIRECTV seeks waivers of the associated power flux density (pfd) information requirements contained in Sections 25.264(b) and (d) of our rules, arguing that absent the gain data, there is no way to determine the exact pfd levels resulting from RB-2A's operations.⁶

¹ The Establishment of Policies and Service Rules for the Broadcasting-Satellite Service at the 17.3-17.7 GHz Frequency Band and at the 17.7-17.8 GHz Frequency Band Internationally, and at the 24.75-25.25 GHz Frequency Band for Fixed Satellite Services Providing Feeder Links to the Broadcasting-Satellite Service and for the Satellite Services Operating Bi-directionally in the 17.3-17.8 GHz Frequency Band, *Second Report and Order*, IB Docket No. 06-123, FCC 11-93, 26 FCC Rcd 8927 (2011) (*17/24 GHz BSS Second Report and Order*).

² 47 C.F.R. § 25.111(a).

³ 47 C.F.R. § 25.264(a).

⁴ 47 C.F.R. § 25.264(c).

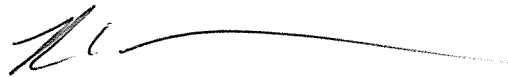
⁵ SAT-MOD-20120314-00042, Narrative at pp. 1-2.

⁶ SAT-MOD-20120314-00042, Narrative at p. 2.

We ask DIRECTV to provide additional explanation as to why it cannot supply the predicted antenna off-axis gain data. In the alternative, DIRECTV may supply the predicted antenna off-axis gain data (and if necessary the accompanying pfd calculations) ,as required by Section 25.264(a) and (b) of our rules.

We request that DIRECTV respond to the item addressed in this letter by June 4, 2012. The response should include a copy to Mark Young of my staff (Mark.Young@fcc.gov). Failure to do respond by this date, may result in dismissal of the application, pursuant to Section 25.112 and 25.152(b) of the Commission's rules.⁷

Sincerely,

A handwritten signature in black ink, appearing to read 'R. Nelson', followed by a long, thin horizontal line that tapers to the right.

Robert G. Nelson
Chief, Satellite Division
International Bureau

⁷ 47 C.F.R. § 25.112 and 25.152(b).