

February 7, 2014

## **BY ELECTRONIC FILING**

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

Re: IBFS File No. SAT-MOD-20130718-00096 (Call Sign S2861)

Dear Ms. Dortch:

On July 18, 2013, DIRECTV Enterprises, LLC ("DIRECTV") filed the above referenced application for modification of its license to launch and operate DIRECTV KU-79W, a Ku-band satellite to be located at the nominal 79° W.L. orbital position. As noted in footnote 3 of the narrative portion of that application, the satellite also includes a 17/24 GHz BSS payload. Because DIRECTV is not seeking operational authority for that payload at this time, it requested a waiver from the requirement in Section 25.264 of the Commission's rules to submit with its application specific predicted transmitting antenna off-axis gain information and a power flux density calculation based thereon to show that its proposed operations would not exceed the applicable coordination trigger at the location of any prior-filed U.S. DBS space station.

This is to clarify that, notwithstanding its request for waiver of the requirements for predicted data and related calculations applicable to 17/24 GHz BSS systems at the application stage, DIRECTV understands that such waiver would not extend to the requirement for measured data and related calculations that would apply should DIRECTV ever seek operational authority for this payload. DIRECTV fully intends to conduct such measurements prior to launch of the satellite so that it will be in a position to supply that information if necessary in the future.

If you have any questions, please do not hesitate to contact me.

Respectfully submitted,

/s/

William M. Wiltshire Counsel for DIRECTV Enterprises, LLC

cc: Andrea Kelly