

December 23, 2013

BY ELECTRONIC FILING

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

Re: *IBFS File Nos. SAT-MOD-20131114-00133 and SAT-STA-20131115-00136*

Dear Ms. Dortch:

In the above referenced applications, DIRECTV Enterprises, LLC (“DIRECTV”) has sought authority to reorient the DIRECTV 5 spacecraft’s uplink and downlink beams slightly to the East so that it will be able to provide better service to subscribers of DIRECTV Latin America in Puerto Rico. In support of that request, DIRECTV has stated that the programming transmitted by DIRECTV 5 is a subset of the programming transmitted by other DIRECTV satellites, and thus, U.S. subscribers outside of Puerto Rico – including those in Alaska and Hawaii – also have access to all of the programming carried by DIRECTV 5, but receive that programming from other DIRECTV satellites. In this letter, we elaborate upon that statement.

DIRECTV 5 is currently authorized to operate on three DBS channels at the 110° W.L. orbital location. DIRECTV is also authorized to operate other DBS satellites on 32 DBS channels at the 101° W.L. orbital location and 11 DBS channels at the 119° W.L. orbital location. The programming currently being transmitted by the three DBS channels on DIRECTV 5 is also being transmitted over the same coverage area (including CONUS, Alaska, and Hawaii) by a combination of channels from the DIRECTV 8 and DIRECTV 9S satellites at 101° W.L. The software in DIRECTV’s set-top boxes associates requested programming with a particular channel on a particular satellite, based on the subscriber’s zip code information. As such, set-top boxes outside of Puerto Rico receive the common programming from DIRECTV 8 or DIRECTV 9S, as appropriate, whereas set-top boxes in Puerto Rico receive that programming from DIRECTV 5.

WILTSHIRE & GRANNIS LLP

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

Respectfully submitted,

/s/

William M. Wiltshire
Counsel for DIRECTV

cc: Stephen Duall