

## **EXHIBIT A**

### **APPLICATION FOR MILESTONE EXTENSION OR WAIVER**

DIRECTV Enterprises, LLC (“DIRECTV”) is authorized to launch and operate DIRECTV RB-1, a 17/24 GHz Broadcasting Satellite Service (“BSS”) payload (Call Sign S2711), at the nominal 99° W.L. orbital location.<sup>1</sup> Soon after receiving its license, DIRECTV diligently entered into a satellite construction contract and a launch services contract for a spacecraft (DIRECTV 14) that will include a 17/24 GHz BSS payload to be operated under this license, coordinated to satisfy the July 28, 2014 “launch and begin operations” milestone in its authorization. The satellite has been fully constructed and tested since December 2013, with 98.5% of all pre-launch construction payments made. DIRECTV has also maintained its place in the queue of its launch provider, and made 90% of the payments required under that agreement. No one is more eager to launch this satellite than DIRECTV.

Unfortunately, for a variety of reasons beyond DIRECTV’s control, the current launch window for the satellite has moved steadily later in time. It is currently estimated to fall sometime in December 2014, after which DIRECTV will need to conduct in-orbit testing before moving the satellite to its assigned location and beginning operations. Accordingly, pursuant to Section 308 of the Communications Act of 1934, as amended, and Section 25.117(e) of the Commission’s rules, DIRECTV hereby requests a seven-month extension, up to and including February 28, 2015, to meet its “launch and begin operations” milestone for DIRECTV RB-1. In the alternative, it requests that the Commission waive that milestone for good cause shown.

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<sup>1</sup> See Grant Stamp, IBFS File Nos. SAT-LOA-20060908-00099, SAT-AMD-20080114-00013, and SAT-AMD-20080321-00076 (July 28, 2009) (“DRB-1 Authorization”); Grant Stamp, IBFS File No. SAT-MOD-20110727-00135 (Oct. 26, 2011).

## **A. DIRECTV Has Proceeded Diligently**

DIRECTV and its affiliates have invested decades of effort and several billion dollars in developing and implementing the nation's leading direct-to-home ("DTH") satellite system. As part of its ongoing efforts to augment its capabilities, in 1997 DIRECTV filed a petition for rulemaking to allocate spectrum for the 17/24 GHz BSS service in the U.S. Table of Frequency Allocations,<sup>2</sup> and was the first to seek authority from the Commission to operate in the 17/24 GHz BSS band.<sup>3</sup> After participating in the ensuing rulemaking and pursuing its applications for over a decade, DIRECTV was finally awarded several of the first licenses issued in this new band.

One such license was for DIRECTV RB-1 to operate in the 17/24 GHz BSS band at the nominal 99° W.L. orbital location. That authorization included the following performance milestone requirements:

1. Execute a binding contract for construction by July 28, 2010;
2. Complete the Critical Design Review ("CDR") by July 28, 2011;
3. Commence construction by July 28, 2012; and
4. Launch and begin operations by July 28, 2014.<sup>4</sup>

DIRECTV timely submitted proof that it had satisfied the first three milestones.<sup>5</sup> As reflected in the contract with Space Systems/Loral ("SS/L") submitted to the Commission, construction of the spacecraft was scheduled to be completed in the second quarter of 2013 – more than a year ahead of the final milestone. In addition, DIRECTV

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<sup>2</sup> See *Public Notice*, Rep. No. 2208 (rel. July 1, 1997).

<sup>3</sup> See IBFS File Nos. SAT-LOA-19970605-00049, -00050, and -00051.

<sup>4</sup> DRB-1 Authorization, ¶ 5.

<sup>5</sup> The Commission has confirmed DIRECTV's satisfaction of the first two milestone requirements. See *Public Notice*, 27 FCC Rcd. 2221 (Int'l Bur. 2012). DIRECTV's showing with respect to the third milestone remains pending.

entered into a launch services contract with Arianespace in September 2011,<sup>6</sup> targeting a launch window well in advance of that milestone.

At all times, DIRECTV has proceeded diligently with development of the DIRECTV RB-1 satellite system. The 17/24 GHz BSS payload is part of a hybrid spacecraft, known as DIRECTV 14, that also includes a Ka-band payload.<sup>7</sup> Evidence of DIRECTV's commitment to developing and launching this satellite include the following:

- DIRECTV has made 98.5% of all pre-launch construction payments due under the SS/L construction contract. DIRECTV has had an employee on-site at SS/L to monitor progress of construction. As verified by the letter (with photographs) attached hereto as Attachment A, SS/L completed initial construction of the spacecraft and placed it in storage in December 2013.<sup>8</sup>
- As further verified by the letter attached hereto as Attachment B, DIRECTV has paid Arianespace 90% of the price of the launch services contract applicable to DIRECTV 14, which remains in full force and effect.
- DIRECTV has also made significant progress with other elements of its system, including the construction of in-orbit test, TT&C and communications ground infrastructure at three of DIRECTV's existing uplink facilities (in Castle Rock, CO,

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<sup>6</sup> See Press Release, "Arianespace to launch up to four satellites for DIRECTV" (Sep. 13, 2011) (available at <http://www.arianespace.com/news-press-release/2011/9-13-2011-directv.asp>).

<sup>7</sup> See Grant Stamp, IBFS File No. SAT-LOA-20120518-00085 (Dec. 4, 2012).

<sup>8</sup> This was several months later than initially anticipated, due to issues with procurement of Ka-band travelling wave tube assemblies ("TWTAs"). In addition, SS/L subsequently discovered an issue with the solar array on the spacecraft. SS/L believes that issue has now been addressed, and the spacecraft will be ready for delivery to the launch site in August 2014. As discussed below, this new delivery date will still be months ahead of the next available Ariane 5 launch window, and so is not expected to cause any delay in the current schedule.

New Hampton, NH, and Moxee, WA), and development of new consumer equipment capable of receiving and processing signals in the 17/24 GHz BSS band.

**B. The Unavailability of a Launch Vehicle Has Unexpectedly Prevented DIRECTV From Satisfying the Final Milestone Requirement**

As discussed above, DIRECTV has had a launch services contract with Arianespace in place for several years, and during that time has been working toward a launch in late 2013 or early 2014. Arianespace is one of the world's premier launch providers, capturing more than half of all commercial satellite launches each year.<sup>9</sup> With an unbroken string of 59 successful Ariane 5 launches over the last eleven years, it is also the most reliable launch service provider.<sup>10</sup> Unfortunately, no launch slot is available prior to July due to the combination of factors beyond DIRECTV's control. These factors are discussed below.

First, although DIRECTV has maintained its place in the Arianespace launch queue, that place has marched steadily later in time due to delays in earlier-scheduled launches. Given the complexity of the satellite launch process, delays are not an uncommon occurrence in the industry. Moreover, because of the nature of Arianespace's co-passenger launches, one satellite operator may be ready for launch but be delayed by wholly unrelated problems experienced by another satellite operator. Specifically,

[t]he Ariane 5's business model is based on launching two commercial telecommunications satellites at a time, which usually means pairing one large satellite with one that is much smaller. The difficulty of finding two satellites ready for launch at the same time with a combined weight that

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<sup>9</sup> See Arianespace Service and Solutions (available at <http://www.arianespace.com/about-us/service-solutions.asp>).

<sup>10</sup> See Arianespace – Launch Smart, at 3 (available at <http://www.arianespace.com/about-us-corporate-information/Arianespace-Corporate-Brochure-2014-EN.pdf>) (“Arianespace Brochure”); Arianespace Mission Update, “Arianespace's Ariane 5 orbits satellites at the service of SES and HISPASAT” (Mar. 22, 2014) (available at <http://www.arianespace.com/news-mission-update/2014/1147.asp>).

fits into the Ariane 5 has long been one of the challenges for Arianespace.<sup>11</sup>

Indeed, this challenge was vividly illustrated at the end of 2013. Arianespace had scheduled the final Ariane 5 launch of the year for December 6, 2013. Unfortunately, the small satellite passenger on that flight (Amazonas 4A) was delayed, so both it and its co-passenger (Astra 5B) could not make use of that launch window.<sup>12</sup> Ultimately, that pair of satellites was rescheduled for launch on March 7, 2014.<sup>13</sup> Even then, the launch was further delayed by approximately two weeks in order to accommodate “complementary checks” on the Amazonas 4A satellite.<sup>14</sup>

Arianespace also had to delay the currently pending Ariane 5 launch, most recently scheduled for June 6, because one of the passengers (the Optus 10 satellite) “requires additional verifications.”<sup>15</sup> Arianespace has yet to announce a rescheduled date for that launch. Indeed, every Ariane 5 launch in 2014 has been delayed to some extent.<sup>16</sup> Unfortunately, such delays inevitably push back launch windows for other satellites in the queue, including DIRECTV 14 and its DIRECTV RB-1 payload.

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<sup>11</sup> Peter B. de Selding, “Ariane 5 Manifest Unsettled for Remainder of 2013 and into 2014,” SPACENEWS (Jun. 26, 2013) (available at <http://www.spacenews.com/article/launch-report/35984ariane-5-manifest-unsettled-for-remainder-of-2013-and-into-2014>).

<sup>12</sup> See Stephen Clark, “Next Ariane 5 launch delayed to January by satellite issue,” SPACEFLIGHT NOW (Nov. 13, 2013) (available at <http://spaceflightnow.com/ariane/va216/131113delay/>).

<sup>13</sup> Arianespace Mission Update, “Dates set for Arianespace’s first three missions of 2014: Year-opening flight is VA217 on February 6” (Jan. 14, 2014) (available at <http://arianespace.com/news-mission-update/2014/1124.asp>).

<sup>14</sup> Arianespace Mission Update, “Ariane 5 Flight VA216 is postponed for payload checks” (Feb. 14, 2014) (available at <http://www.arianespace.com/news-mission-update/2014/1132.asp>).

<sup>15</sup> See Press Release, “Arianespace Flight VA218: Launch Postponed” (May 26, 2014) (available at <http://www.arianespace.com/news-press-release/2014/5-26-2014-VA218.asp>).

<sup>16</sup> See Press Release, “Ariane Flight VA217: Ariane 5 ECA – ABS-2 – Athena Fidus: Launch postponed” (Jan. 6, 2014) (available at <http://www.arianespace.com/news-press-release/2014/1-6-2014-VA217-launch-postponed.asp>); Press Release, “Ariane Flight VA216: Ariane 5 ECA – Astra 5B – Amazonas 4A launch postponed” (Feb. 14, 2014) (available at <http://www.arianespace.com/news-press-release/2014/2-14-2014-VA216-launch-postponed.asp>). In addition, Arianespace is committed to

Second, although Sea Launch and International Launch Services (“ILS”) have the capability to launch a satellite the size of DIRECTV 14, neither of them offers a practical alternative capable of meeting the impending milestone deadline. Switching to a different provider would not expedite launch of the satellite, as there are already others waiting on their manifests. Indeed, the schedules of those other launch providers also have been affected by recent anomalies. ILS suffered a Proton launch failure on July 2, 2013 – the fourth launch anomaly for a Proton in two years.<sup>17</sup> It resumed launch operations later in the year, but suffered another anomaly on its most recent launch.<sup>18</sup> Moreover, the ILS launch manifests for 2014 and 2015 are reportedly full.<sup>19</sup> Sea Launch suffered a launch failure in January 2013, and although the investigation into the cause of that failure concluded in May 2013,<sup>20</sup> there were no launches on that platform until late May 2014.<sup>21</sup> By contrast, Arianespace is planning a record number of launches this year, and the Ariane 5 has proven to be a very reliable platform. Accordingly, there simply is no better option for launching DIRECTV’s satellite – and launching it quickly.

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launch the Automated Transfer Vehicle to the International Space Station in late July – a launch window that cannot be moved and therefore will push the queue back still farther.

<sup>17</sup> See “Fiery Proton Rocket Crash Leaves Commercial Customers in Limbo,” SPACENEWS (Jul. 8, 2013) (available at <http://www.spacenews.com/article/launch-report/36142fiery-proton-rocket-crash-leaves-commercial-customers-in-limbo>).

<sup>18</sup> See Press Release, “Russian State Commission Investigates Russian Federal Proton Launch Anomaly” (May 16, 2014) (available at <http://www.ilslaunch.com/newsroom/news-releases/russian-state-commission-investigates-russian-federal-proton-launch-anomaly>).

<sup>19</sup> See Peter B. de Selding, “ILS Rises Above Proton Problems,” SPACE NEWS (Jan. 13, 2014) (available at <http://www.spacenews.com/article/launch-report/39071launch-satellite-contract-review-ils-rises-above-proton-problems>).

<sup>20</sup> Press Release, “Sea Launch IS-27 FROB Report Complete” (Jun. 3, 2013) (available at <http://www.sea-launch.com/news/11365>).

<sup>21</sup> Press Release, “Sea Launch Successfully Launches EUTELSAT 3B” (May 27, 2014) (available at <http://www.sea-launch.com/news/11407>).

### **C. Commission Precedent Supports Granting a Milestone Extension in These Circumstances**

The Commission imposes milestone deadlines for satellite system implementation in order to ensure that licensees proceed with construction and launch of their satellites in a timely manner and that valuable spectrum will not be held, to the exclusion of others, by those who are unwilling or unable to proceed.<sup>22</sup> Extensions may be granted when the delay is due to unforeseeable circumstances beyond the applicant's control, or when there are unique and overriding public interest concerns that justify an extension.<sup>23</sup> In this case, both factors clearly support grant of DIRECTV's milestone extension request.

As discussed above, DIRECTV has had a launch services contract in place for over two years with Arianespace, the most reliable provider of such services. Its satellite has been virtually complete since December 2013. Unfortunately, however, under the most recent estimate, an Ariane 5 launch window for DIRECTV 14 does not open until approximately December 2014. There are no alternatives that would achieve a more expedited launch. Accordingly, through no fault of its own, DIRECTV cannot meet the final milestone in the DIRECTV RB-1 authorization.

These are precisely the sort of circumstances in which the Commission has found extension to be justified and appropriate. For example, in *R/L DBS*, the Commission granted a five-month launch milestone extension based on, among other things, the unavailability of a launch vehicle due to delay in delivery of a spacecraft scheduled for an earlier launch and issues with the launch vehicle itself.<sup>24</sup> The Commission found that

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<sup>22</sup> See, e.g., *Amendment of the Commission's Space Station Licensing Rules and Policies*, 18 FCC Rcd. 10760, ¶ 173 (2003); *TerreStar Networks, Inc.*, 22 FCC Rcd. 17698, ¶ 6 (Int'l Bur. 2007) ("*TerreStar*").

<sup>23</sup> See 47 C.F.R. § 25.117(e). See also *TerreStar*, ¶ 6; *New ICO Satellite Services G.P.*, 22 FCC Rcd. 2229, ¶ 14 (Int'l Bur. 2007) ("*New ICO*").

<sup>24</sup> See *R/L DBS Co., LLC*, 18 FCC Rcd. 7694, ¶¶ 14-15 (Int'l Bur. 2003).

such matters were not within the licensee's control, and therefore justified the requested extension.<sup>25</sup> DIRECTV's situation is virtually the same, and similarly justifies a milestone extension.

In addition, "the Commission has considered the extent of a satellite's construction and the amounts paid toward to the total contract price as factors in milestone extension cases."<sup>26</sup> Thus, for example, the Commission granted a five-month extension to allow ICO to achieve completion and launch of its satellite.<sup>27</sup> Similarly, it granted TerreStar a ten-month extension where its satellite was in the final stages of construction and almost completely paid for, and it had a firm launch contract under which substantial payments had also been made.<sup>28</sup> In this case, DIRECTV essentially completed construction of the satellite months before the launch deadline, and has paid approximately 98.5% of the pre-launch construction payments and 90% of the launch services contract related to the satellite.

Moreover, even were this not the case, DIRECTV's demonstrated commitment to construction and launch of this 17/24 GHz BSS payload presents the unique and overriding public interest grounds that are an independent basis for granting a milestone extension. The launch of the DIRECTV RB-1 payload will mark the culmination of an effort that DIRECTV began over 15 years ago. Its long-time commitment will finally bear fruit with the launch of the first 17/24 GHz BSS payload capable of providing

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<sup>25</sup> *Id.*, ¶ 17. See also *Geostar Positioning Corp.*, 6 FCC Rcd. 2276, ¶ 4 (CCB 1991) (milestone extensions of one to one-and-a-half years granted based on revisions to launch provider's revised manifest).

<sup>26</sup> *New ICO*, ¶ 15.

<sup>27</sup> *Id.*

<sup>28</sup> See *TerreStar*, ¶ 7 and n.15 (discussing factors and citing other cases in which similar commitment justified milestone extension).



commercial service. This additional capacity is coming online just in time to support the launch of bandwidth-intensive ultra-high definition television (“Ultra HD”) services, which promise a leap forward for video programming similar to that achieved with the introduction of high definition service.<sup>29</sup> DIRECTV has invested years of effort and hundreds of millions of dollars to get to this point. No one is more anxious to launch this satellite than is DIRECTV.

The Commission has found similar circumstances to justify extension of the launch and operate milestone in prior cases. For example, in *TerreStar*, the Commission found overriding public interest considerations that justified a ten-month extension. There, as here, the licensee had demonstrated a substantial and continuing commitment to satellite construction and system implementation.<sup>30</sup> In that case, satellite construction was 84% complete, and the licensee had paid 97% of the total amount due under the satellite construction contract price and 70% of the total amount due under the launch services contract. The Commission also noted that grant of the extension would serve the public interest because it would allow a licensee “that has demonstrated diligence and commitment . . . to expeditiously complete implementation of a satellite system with advanced capabilities for homeland security, rural connectivity, and other critical communications purposes.”<sup>31</sup>

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<sup>29</sup> Ultra HD is an umbrella term that describes two different resolutions: 4K Ultra HD and 8K Ultra HD. 4K Ultra HD has a resolution of 3,840 x 2,160 pixels, which is four times the number of pixels as HDTV, while 8K Ultra HD has a resolution of 7,680 x 4,320 pixels, or sixteen times the number of pixels as HDTV.

<sup>30</sup> *TerreStar*, ¶ 7.

<sup>31</sup> *Id.*, ¶ 10.

For similar reasons, granting a seven-month extension would be appropriate here.<sup>32</sup> Like TerreStar, DIRECTV has worked diligently and invested significantly in its satellite system, which will be the first one capable of providing commercial service in the 17/24 GHz BSS band. DIRECTV has firm arrangements in place for launch of the satellite within the period of the extension requested herein. It has requested a period somewhat beyond that launch window in order to accommodate the time necessary for in-orbit testing and arrival of the satellite on station at its assigned orbital location. Such an extension is clearly justified in the circumstances presented here.

**D. In the Alternative, the Commission Should Waive the Final Milestone**

Pursuant to Section 1.3 of the Commission’s rules, the Commission may waive its rules for good cause shown.<sup>33</sup> “Waiver is appropriate if special circumstances warrant a deviation from the general rule and such deviation would better serve the public interest than would strict adherence to the general rule,” including “more effective implementation of overall policy.”<sup>34</sup> In determining whether waiver is appropriate, the Commission should “take into account considerations of hardship, equity, or more effective implementation of overall policy.”<sup>35</sup>

As explained above, the evidence that the satellite has been fully constructed and will be ready for launch months before its launch vehicle will be available demonstrates good cause for a waiver in this case. DIRECTV could neither foresee nor control the cause of the launch delay, and a waiver would not undermine the purpose of the

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<sup>32</sup> See 47 C.F.R. § 25.117(e) (applicant must justify length of requested extension).

<sup>33</sup> 47 C.F.R. § 1.3. See also *WAIT Radio v. FCC*, 418 F.2d 1153 (D.C. Cir. 1969), cert. denied, 409 U.S. 1027 (1972); *Northeast Cellular Telephone Co., LP v. FCC*, 897 F.2d 1164 (D.C. Cir. 1990).

<sup>34</sup> *GE American Communications, Inc.*, 16 FCC Rcd. 11038, ¶ 9 (Int’l Bur. 2001).

<sup>35</sup> *WAIT Radio*, 418 F.2d at 1159.





**ATTACHMENT A**



John Celli  
President

June 19, 2014

Brian Regan  
Vice President and Deputy General Counsel  
DIRECTV  
2260 E. Imperial Highway  
El Segundo, CA 90245

Re: SSL Letter in support of DIRECTV's FCC Extension Request

Dear Mr. Regan:

Space Systems/Loral (SSL) provides the following information regarding the original contract schedule and the current anticipated schedule for DIRECTV's use with the FCC in support of DIRECTV's extension request of its reverse band authorization.

The construction of DIRECTV-14 satellite is at a very advanced stage now. At this time, the spacecraft is in storage with all components and subsystems complete with the exception of the Solar Array. All major test phases are complete including spacecraft Thermal Vacuum, Vibration and Acoustics, Compact Antenna Test Range, and Final Performance. The flight model Batteries have been installed and the performance of the spacecraft has been shown to satisfy the contractual requirements during each test phase.

The original contract ship date for DIRECTV-14 was April 2013, however the spacecraft experienced delays to the delivery schedule for reasons including subcontract vendor selection, manufacturing processes, technical challenges and the desire to do additional work on the satellite to eliminate a situation experienced by another satellite manufactured by SSL. Now, the delays have been addressed and certain re-work is complete and being tested. We anticipate the final component for DIRECTV-14, which is currently being tested, will be ready in August, 2014.

Based on this expectation, the DIRECTV-14 spacecraft will be ready to ship to the launch site as early as September, 2014. This ready-to-ship date supports the current Ariane 5 schedule based on our current knowledge of the Arianespace manifest.

Letter to Brian Regan

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June 19, 2014

Attached are photographs of the DIRECTV-14 spacecraft in four major phases of its integration and test program:

- Spacecraft Thermal Vacuum
- Vibration
- Compact Antenna Test Range (CATR)
- Storage (without Solar Arrays)

Per your request, we confirm that this letter is given for information purposes only with respect to DIRECTV's need to provide an update to the FCC, and all terms, conditions, obligations and covenants of the contract will remain and continue in full force and effect, without any change whatsoever. Additionally, SSL confirms that we have received all payments due and owing from DIRECTV to date. Such payments amount to approximately 98% of the DIRECTV-14 satellite price (which does not include certain payments related to performance and in-orbit incentives).

We have and will continue to undertake every effort to mitigate delays on the DIRECTV-14 program. We firmly believe that the quality of the product we deliver is of supreme importance. Please be assured that we will not make any compromise on the quality of the satellite in the interest of schedule.

Sincerely,



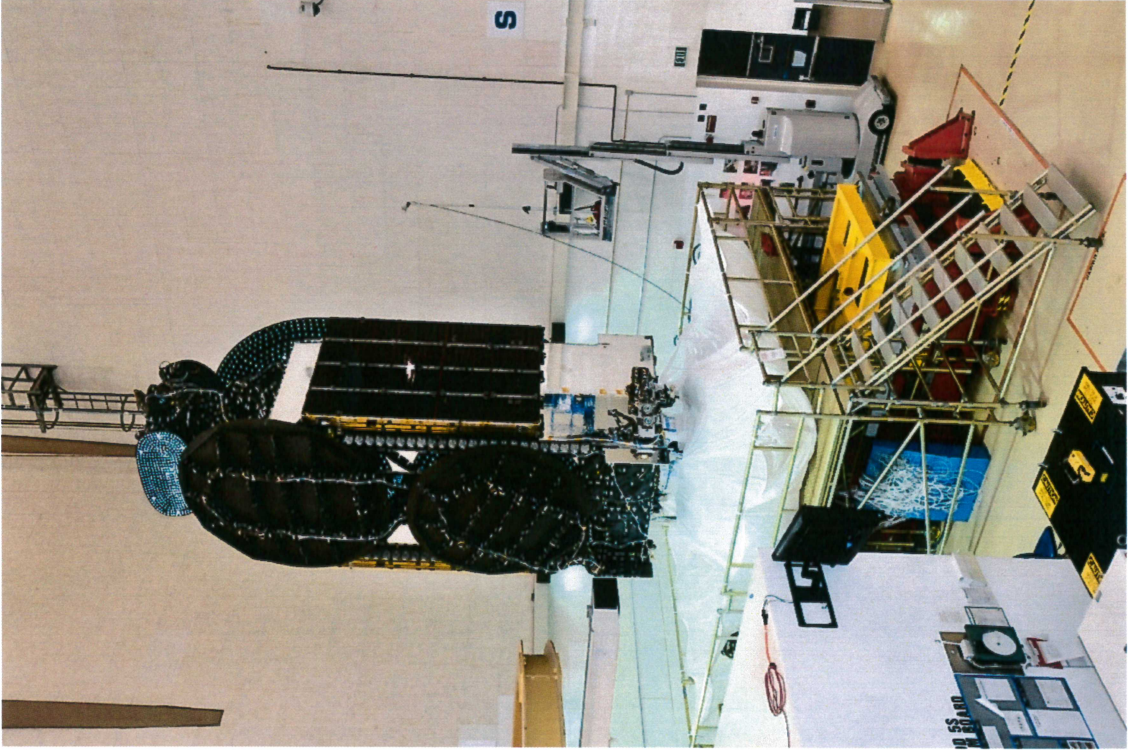
John Celli  
President

cc: Phil Goswitz

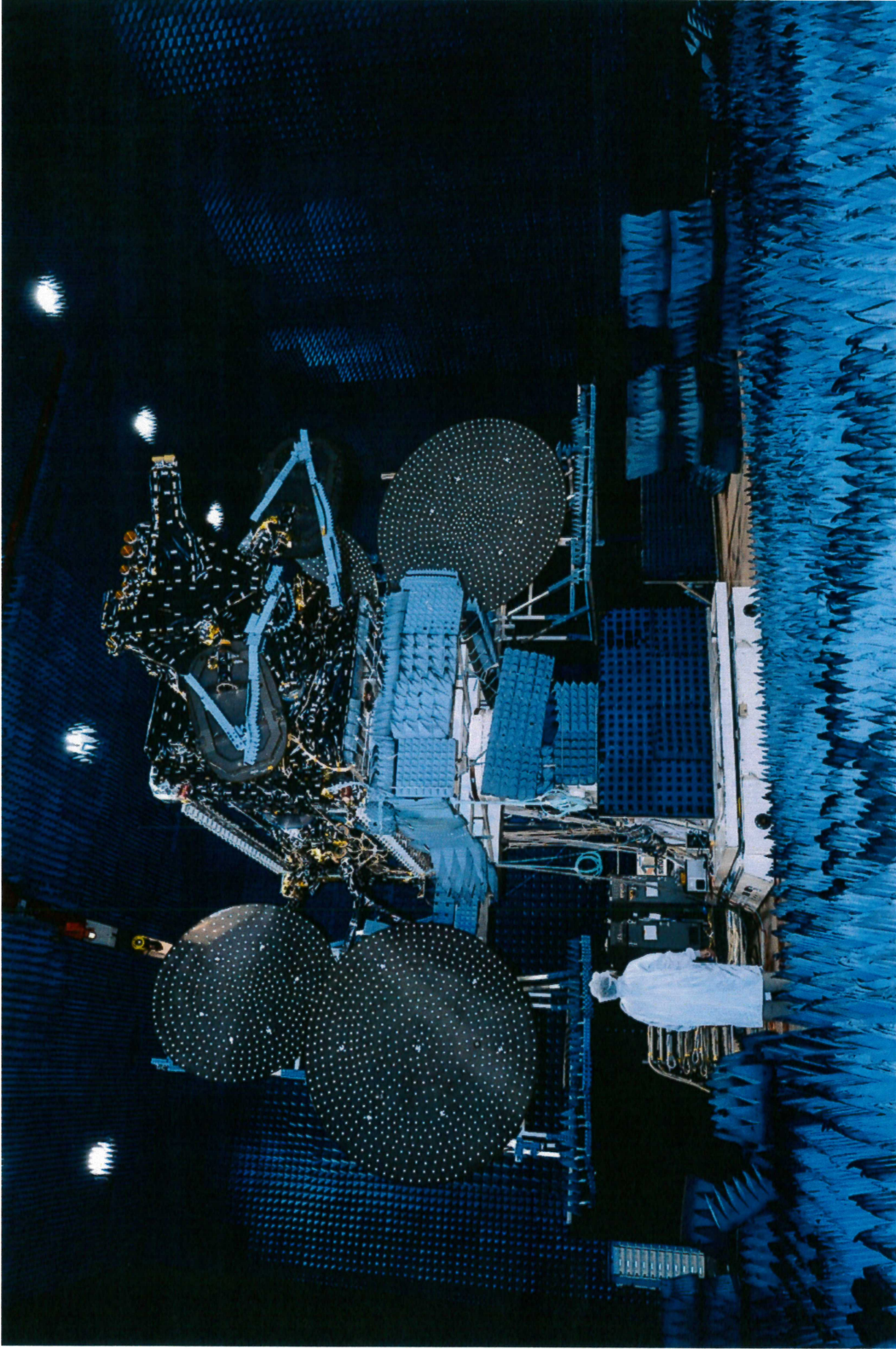


**DIRECTV-14 Lifted from the Spacecraft Thermal Vacuum Chamber**

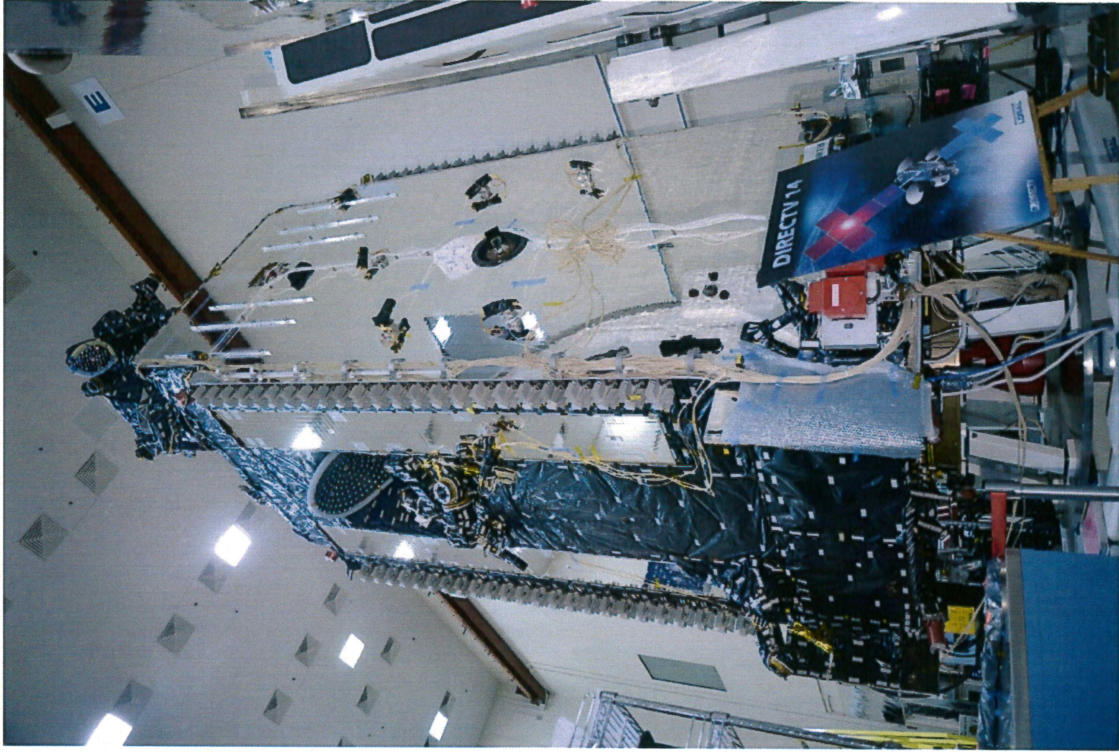




**DIRECTV-14 Being Tested in Spacecraft Vibration Facility**



Compact Antenna Test Range Testing of DIRECTV-14



Images are for SSI internal use only.  
Images to be used for public, customer, or supplier release must be pre-approved in advance by Export Control and Business Development.

## **DIRECTV-14 Shown in Storage (June 10, 2014)**

**ATTACHMENT B**

Direction Commerciale

Attn. Mr. Brian REGAN  
Associate General Counsel  
DIRECTV OPERATIONS, Inc  
2230 East Imperial Hwy  
El Segundo  
California 90245  
USA

Evry-Courcouronnes, 18 June 2014  
Ref.: DC/SC/CBA/VPR/L14-118 Issue 2

**VIA ELECTRONIC MAIL ONLY**

**Subject: DIRECTV-14 and 15 Launch Services Agreements Status**

Dear Mr. Regan,

This purpose of this letter is to confirm that the Launch Services Agreement (Contract DC/V/RDA/VSH/C11-009 signed on September 09<sup>th</sup>, 2011) for DIRECTV-14 and DIRECTV-15 is in full force and effect. Current manifest objectives foresee a launch of DIRECTV-14 before the end of 2014 and DIRECTV-15 is expected to be launched during the first quarter of 2015.

I also want to confirm that, to date, DIRECTV has paid 90 % of the launch services price for DIRECTV-14 and 90 % of the launch services price for DIRECTV-15.

Do not hesitate to contact me if you have further questions.

With my best regards,



Christophe BARDOU  
Program Director for DIRECTV-14

**Copies:**

**DIRECTV** P. Goswitz, J. Seto, C. Ho.  
**Arianespace** W. Kernisan, M. Callari, F. Desnoues, C. Bardou, R. Darde.

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