

November 6, 2014

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ATTORNEYS AT LAW

BY ELECTRONIC FILING

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

Re: *Submission of Measured Transmitting Antenna Off-Axis Gain Information for
Call Sign S2711, SAT-MOD-20141103-00119*

Dear Ms. Dortch:

On November 3, 2014, DIRECTV Enterprises, LLC (“DIRECTV”) submitted measured transmitting antenna off-axis gain information and associated power flux-density (“PFD”) calculations for DIRECTV RB-1, a geostationary satellite in the 17/24 GHz Broadcasting Satellite Service (“BSS”) authorized to operate at the nominal 99° W.L. orbital location.¹ That submission included a request, to the extent necessary, for waiver of Section 25.264(a) of the Commission’s rules (as incorporated by Section 25.264(c)). In this regard, DIRECTV noted that, due to mechanical/physical limitations of the test fixture, measurements could only be made over a range of ±50 degrees relative to the equatorial plane in planes rotated from the X-Z plane about the Z axis, rather than the ±60 degrees called for in Section 25.264(a). DIRECTV should have noted that these same mechanical/physical limitations also restricted measurements in the X-Z plane itself, *i.e.*, the plane of the geostationary orbit, to a range of approximately ±27 degrees, rather than ±30 degrees as specified in the rule, when the test fixture was at the ±50 degree limit.

Please let me know if you have any questions.

Respectfully submitted,

/s/

William M. Wiltshire
Counsel for DIRECTV Enterprises, LLC

¹ See Letter from William M. Wiltshire to Marlene H. Dortch, IBFS File No. SAT-MOD-20141103-00119 (Nov. 3, 2014).