

June 15, 2015

BY ELECTRONIC FILING

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

Re: *IBFS File No. SAT-MOD-20150415-00022 (Call Sign S2888)*

Dear Ms. Dortch:

On April 15, 2015, DIRECTV Enterprises, LLC (“DIRECTV”) filed the above referenced application for modification of its license to launch and operate DIRECTV KU-76W, a Ku-band satellite to be located at the nominal 76° W.L. orbital position. DIRECTV wishes to supplement that application with respect to two issues.

First, 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,¹ 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.

Second, the application requests authority to locate the satellite at 76.2° W.L., or 0.2° west of its currently authorized position. That change would move the satellite very slightly closer to the Simon Bolivar satellite (operating under the ITU network name VENESAT-1) located at 78° W.L. The two satellites do not transmit in the same frequency band, as Simon Bolivar uses the 11.45-11.7 GHz downlink band while DIRECTV KU-76W uses the 11.7-12.2 GHz downlink band. Accordingly, there is no

¹ DIRECTV does, however, seek authority to construct and launch the 17/24 GHz BSS payload on DIRECTV KU-76W.

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possibility of downlink interference. With respect to the uplink, the attached comparison on the VENESAT-1 uplink beams filed at ITU and the DIRECTV KU-76W uplink beam filed with Commission demonstrates that there is no geographic overlap between the beams. Accordingly, here again there is no possibility of uplink interference.

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

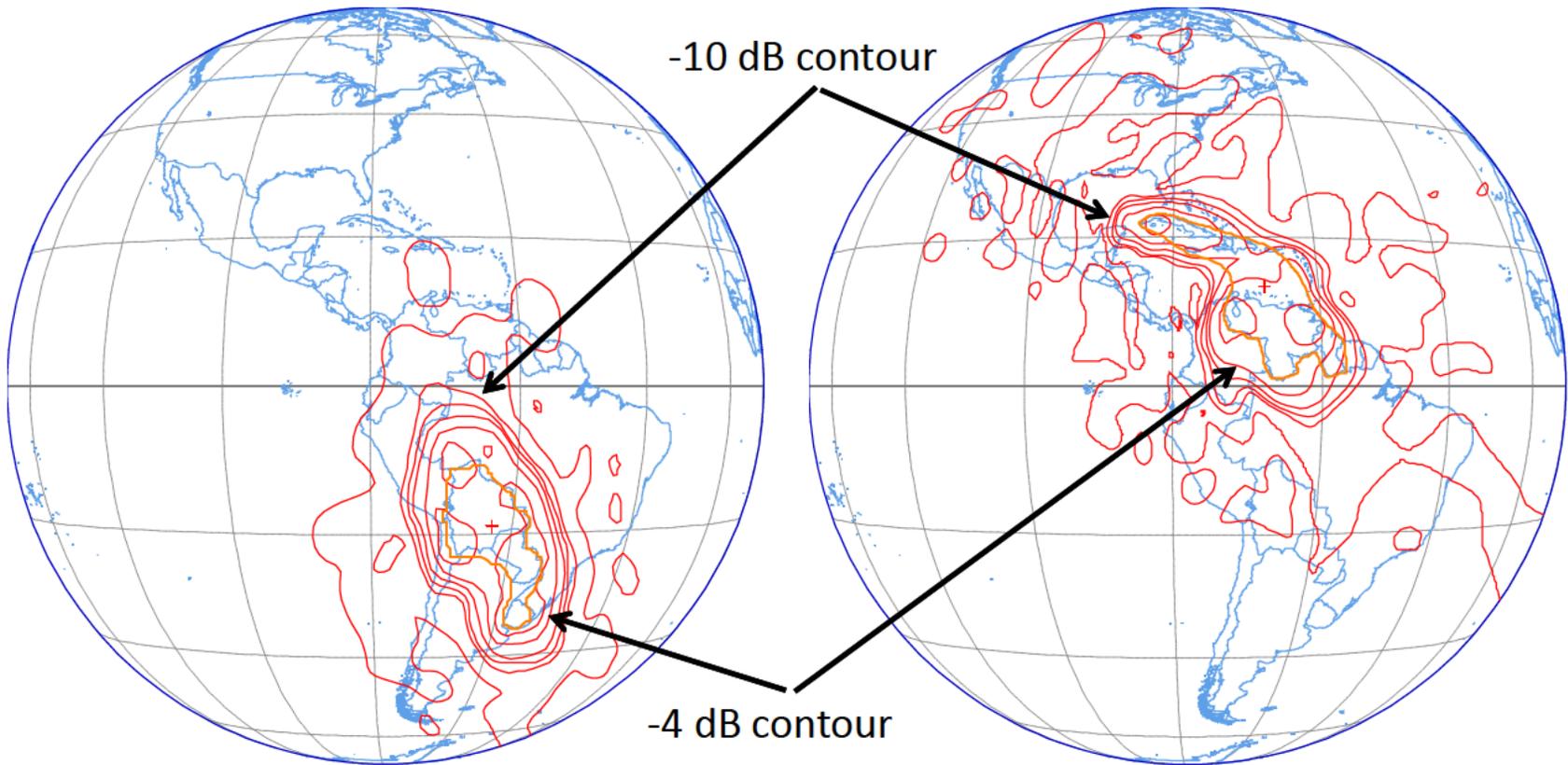
Respectfully submitted,

/s/

William M. Wiltshire

Counsel for DIRECTV Enterprises, LLC

cc: Kathryn Medley



-10 dB contour

-4 dB contour

VENESAT-1 RX Beams



DIRECTV KU-76W RX Beams