

Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of

DIRECTV Enterprises, LLC

Application to Modify Authorization for
DIRECTV 9S (S2669 and S2689)

File No. SAT-MOD- _____

**APPLICATION OF DIRECTV ENTERPRISES, LLC
TO MODIFY AUTHORIZATION FOR DIRECTV 9S**

DIRECTV Enterprises, LLC (“DIRECTV”), pursuant to Section 25.117 of the rules of the Federal Communications Commission (“Commission” or “FCC”),¹ hereby seeks to modify the authorization for the DIRECTV 9S satellite (call signs S2669 and S2689).² Specifically, DIRECTV requests that the FCC consolidate the two call signs so that the spacecraft has one call sign covering all frequency bands and one license expiration date.

In accordance with the requirements of the Commission’s rules,³ this application has been filed electronically as an attachment to FCC Form 312. DIRECTV incorporates by reference the technical information previously provided regarding the operations of DIRECTV 9S.⁴ Consistent with Section 1.62 of the Commission’s rules, DIRECTV will continue to operate

¹ 47 C.F.R. § 25.117.

² See *Policy Branch Information; Actions Taken*, Public Notice, Report No. SAT-00403, File Nos. SAT-MOD-20060908-00101 and SAT-AMD-20060918-00102 (Nov. 17, 2006); see also *DIRECTV Enterprises, LLC Applications for Authority to Launch and Operate the DBS and Ka-band Payloads on the DIRECTV 9S Satellite; Amendment to Change Orbital Location*, Order and Authorization, 21 FCC Rcd 8028 (2006) (“DIRECTV 9S Order”).

³ 47 C.F.R. § 25.117(c).

⁴ See *supra* note 2.

the DIRECTV 9S satellite pursuant to the terms and conditions of its existing authority until such time as the Commission makes a determination with respect to this request.⁵

I. REQUEST FOR CONSOLIDATION OF CALL SIGNS AND LICENSE TERMS

DIRECTV requests that the FCC consolidate the authority granted for the DIRECTV 9S satellite into a single call sign, covering all frequency bands and with a harmonized license term. The DIRECTV 9S satellite, currently operating at 101.1° W.L., is a hybrid satellite, authorized to operate in the Ka-band under call sign S2689 and in the Direct Broadcast Satellite (“DBS”) frequency bands under call sign S2669.⁶ The DIRECTV 9S satellite was placed into service on December 18, 2006.⁷ The fifteen year license term for the Ka-band frequencies on the DIRECTV 9S satellite continues until December 17, 2021. The ten year license term for the DBS frequencies on the DIRECTV 9S satellite expires on December 17, 2016. DIRECTV requests that the FCC eliminate one of the two call signs for this spacecraft and apply the existing December 17, 2021 license expiration date to the entire spacecraft.

⁵ 47 C.F.R. § 1.62. On November 15, 2016, DIRECTV filed a letter requesting that the FCC consolidate the call signs and license terms for several satellites. In this letter, DIRECTV explained that consistent with Section 1.62 of the Commission’s Rules, and to the extent necessary, DIRECTV would continue to operate the DBS frequencies on the DIRECTV 9S satellite pursuant to the terms and conditions of the authorization associated with call sign S2669 expiring December 17, 2016 until such time as the Commission makes a determination with respect to its request. *See* Letter from Jennifer D. Hindin, Counsel for DIRECTV Enterprises, LLC, to Marlene H. Dortch, FCC, Request to Consolidate Satellite Call Signs and License Terms, File Nos. SAT-LOA-20051123-00250 and SAT-MOD-20060908-00101 (filed Nov. 15, 2016). At the request of FCC staff, and to facilitate processing, DIRECTV is also filing this modification application.

⁶ *See supra* note 2.

⁷ *See* Letter from William M. Wiltshire, Counsel for DIRECTV, to Marlene H. Dortch, FCC, File Nos. SAT-RPL-20050322-00070, SAT-LOA-20051123-00250, and SAT-AMD-20051114-00216 (Call Signs S2669 and S2689) (filed Dec. 22, 2006).

II. PUBLIC INTEREST SHOWING

Grant of the requested modification will serve the public interest. Having a single call sign and license term expiration date for the DIRECTV 9S satellite would be administratively efficient and avoid confusion. For this reason, the Commission has previously consolidated call signs for different payloads on a single satellite.⁸ Doing so again here will avoid confusion that might otherwise result from having two call signs and license terms for the same spacecraft.

Moreover, continued operation of DIRECTV 9S poses no risk of harmful interference. DIRECTV will operate this satellite in accordance with the technical parameters on file with and previously approved by the Commission.⁹ These technical parameters include a post-mission disposal plan, which remains unchanged. As previously approved by the Commission, DIRECTV will maneuver the spacecraft into a disposal orbit with an altitude no less than that calculated using the IADC formula: $36,021 \text{ km} + (1000 \cdot \text{CR} \cdot \text{A}/\text{m})$.¹⁰ DIRECTV has reserved 10.16 kg of propellant for final orbit raising maneuvers to this altitude approximately 285 km above geosynchronous altitude.

⁸ See DIRECTV ENTERPRISES, LLC, Application for Authorization to Launch And Operate DIRECTV RB-79W, a Satellite in the 17/24 GHz Broadcasting Satellite Service at 79° W.L., File No. SAT-MOD-20150428-00031 (filed Apr. 28, 2015) (application filed as a request to launch and operate a 17/24 GHz payload on a previously licensed Ku-band satellite was converted into a modification of the existing license, with a single call sign for the Ku-band and 17/24 GHz payloads).

⁹ *Id.*

¹⁰ See *DIRECTV 9S Order*, *supra* note 2.

III. CONCLUSION

For the reasons set forth above, DIRECTV respectfully requests that the Commission grant this modification application to have a single call sign and license term for the DIRECTV 9S satellite.

Respectfully submitted,

/s/ Phil Goswitz

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