

Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of

DIRECTV Enterprises, LLC

Application to Modify Authorization for
T11 (S2640)

File No. SAT-MOD-_____

APPLICATION OF DIRECTV ENTERPRISES, LLC
TO MODIFY AUTHORIZATION FOR T11

DIRECTV Enterprises, LLC (“DIRECTV”), pursuant to Section 25.117 of the Federal Communications Commission’s (“Commission” or “FCC”) rules,¹ hereby seeks to modify the authorization for the T11 satellite (call sign S2640).² Specifically, DIRECTV seeks authorization for the T11 satellite to receive telemetry, tracking, and command (“TT&C”) signals in the 29.56165-29.57165 GHz frequency range on a backup basis. DIRECTV also requests that the Commission update its records to reflect an expiration date of July 21, 2023 for the T11 satellite.

¹ 47 C.F.R. § 25.117.

² *Policy Branch Information; Actions Taken*, Report No. SAT-00278, File Nos. SAT-LOA-20040909-00168, SAT-AMD-20041119-00209, and SAT-AMD-20050103-00001 (Mar. 11, 2005) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-00509, File No. SAT-MOD-20071010-00138 (Mar. 21, 2008) (Public Notice); *Policy Branch Information; Actions Taken*, Report No. SAT-01062, File No. SAT-MOD-20141029-00117 (Jan. 9, 2015) (Public Notice). DIRECTV changed the name of this satellite from DIRECTV 11 to T11 following AT&T’s acquisition of DIRECTV in 2015. See Letter from Jennifer D. Hindin, counsel for DIRECTV, to Marlene H. Dortch, Secretary, FCC (filed June 12, 2017).

I. MODIFICATION REQUESTED

T11 is a Ka-band geostationary (“GSO”) satellite operating at the 99.185° W.L. orbital location. It provides fixed-satellite services (“FSS”), including direct-to-home services, in the 18.3-18.8 GHz (space-to-Earth), 28.35-28.6 GHz (Earth-to-space), and 29.25-29.5 GHz (Earth-to-space) frequency bands.³ DIRECTV requests that the Commission modify its authorization for the T11 satellite to allow use of the adjacent 29.56165-29.57165 GHz frequencies for the limited purpose of receiving TT&C signals on a backup basis.

In its initial application for authorization to launch and operate the T11 satellite, DIRECTV indicated that on-station TT&C would occur at the edges of the Ka-band frequency bands on which the T11 satellite would provide service.⁴ However, anomalous operation of the space station now requires slightly offset use of frequencies to ensure the T11 spacecraft continues to have operational redundant command receivers. Accordingly, DIRECTV requests authorization for the T11 spacecraft to receive TT&C signals in the 29.56165-29.57165 GHz frequency range, on a backup basis only.⁵ Regular, day-to-day TT&C functions will continue to be conducted on the satellite’s previously authorized Ka-band frequencies.

DIRECTV hereby certifies that other than the change to backup TT&C uplink frequencies specified herein, the information in its station license and associated applications has not changed and is incorporated by reference.⁶ The electronic Schedule S submitted with this

³ See *supra* note 2.

⁴ Application of The DIRECTV Group, Inc. for Authorization to Launch and Operate DIRECTV 11, a Partial Replacement Ka-Band Satellite, at 99° W.L., File No. SAT-LOA-20040909-00168, Legal Narrative at 7-8 (filed Sept. 9, 2004).

⁵ Note that operation on these modified frequencies will be through the wide angle coverage antennas, as described in the original application for this satellite.

⁶ See File Nos. SAT-LOA-20040909-00168, SAT-AMD-20041119-00209, SAT-AMD-20050103-0000; SAT-MOD-20071010-00138 and SAT-MOD-20141029-00117.

application required DIRECTV to enter downlink frequencies for the requested new TT&C uplink. The downlink frequencies have not changed; DIRECTV has re-entered this information solely to validate and submit the Schedule S.

II. PUBLIC INTEREST STATEMENT

Granting DIRECTV authority, in the event of an emergency, to operate backup TT&C functions in the 29.56165-29.57165 GHz frequencies on the T11 satellite will serve the public interest, convenience, and necessity.⁷ Specifically, this modification application is necessitated by an anomaly on T11 outside the control of DIRECTV and will serve the public interest by enabling DIRECTV to operate redundant command receivers. This will enhance DIRECTV's ability to provide reliable, quality service to its customers. It will also ensure that DIRECTV can maintain the ability to command the spacecraft, thereby serving the public interest in safe flight operations.

Importantly, grant of the modification requested herein would not create new risks of interference to other operators. The T11 satellite is collocated with DIRECTV's T14 satellite at the nominal 99° W.L. orbital location. Like T11, T14 is a Ka-band GSO satellite that provides FSS, including direct-to-home services.⁸ T14 is already authorized to operate in the 29.5-30.0 GHz band⁹ and DIRECTV has determined that conducting the requested TT&C operations on a backup basis in a frequency band used by the T14 satellite would not impair DIRECTV's ability to provide service. Finally, T11's receipt of command signals in these frequencies causes no

⁷ See 47 C.F.R. § 25.117(d)(2).

⁸ *Policy Branch Information; Actions Taken*, Report No. SAT-00917, File Nos. SAT-LOA-20120518-00085 (Dec. 7, 2012) (Public Notice).

⁹ See *id.*

greater interference to adjacent satellite operators than would be caused by T14's already authorized use of these same frequencies.

DIRECTV believes this request is consistent with Section 25.202(g) of the Commission's rules, which requires TT&C signals to be transmitted at the edges of "assigned bands" unless the transmissions cause no greater interference.¹⁰ DIRECTV understands that the 29.5-30.0 GHz band would be the "assigned band" associated with the backup uplink TT&C signals that are the subject of this modification request. DIRECTV's request to operate in the 29.56165-29.57165 GHz frequency range is close to the edge of the 29.50-30.0 GHz band. Moreover, the use of these frequencies on the T11 satellite will cause no greater interference and require no greater protection from harmful interference than DIRECTV's use of these same frequencies on the collocated T14 satellite at the nominal 99° W.L. orbital location.¹¹

III. CORRECTION OF LICENSE EXPIRATION DATE

DIRECTV also requests that the Commission correct the T11 license to reflect an expiration date of July 21, 2023. This date would be consistent with the 15 year term originally granted to the T11 satellite¹² and set forth in Section 25.121 of the FCC's rules.¹³ DIRECTV filed a letter certifying that the T11 satellite commenced regular operations at its authorized

¹⁰ 47 C.F.R. § 25.202(g)(1).

¹¹ *Policy Branch Information; Actions Taken*, Report No. SAT-00917, File Nos. SAT-LOA-20120518-00085 (Dec. 7, 2012) (Public Notice).

¹² *Application for DIRECTV 11 at 99 WL*, File Nos. SAT-LOA-20040909-00168, SAT-AMD-20050103-00001, and SAT-AMD-20041119-00209, Stamp Grant ¶ 8 (Mar. 8, 2005) (specifying a fifteen year license term for T11 that would run from the date that DIRECTV certified to the Commission that the satellite was placed into orbit and was operational); *MOD – D11 – move to 99.225 WL*, File No. SAT-MOD-20071010-00138, Stamp Grant at 1 (Mar. 19, 2008) (providing that the expiration date was fifteen years from LOA.)

¹³ 47 C.F.R. § 25.121; *Policy and Rules for the Direct Broadcast Satellite Service*, Final Rule, 67 FR 51110-01, 51113 (2002) (adopting the version of Section 25.121(a) that was in place as of the August 2005 T11 license grant).

orbital location on July 22, 2008, thereby establishing a license term end date of July 21, 2023.¹⁴ However, on January 8, 2015, the Commission granted a modification request for the T11 satellite which stated that the expiration date for the T11 license was July 21, 2018, which is only a ten year term.¹⁵ DIRECTV requests that the Commission correct this inadvertent error and restore the original fifteen year term expiration date of July 21, 2023.

IV. CONCLUSION

DIRECTV respectfully requests that the Commission grant this modification application to authorize the T11 satellite to receive telemetry, tracking, and command in the 29.56165-29.57165 GHz frequency range. DIRECTV also requests that the Commission update its records to reflect an expiration date of July 21, 2023 for the T11 satellite.

DIRECTV Enterprises, LLC

By: /s/ Jack Wengryniuk

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September 21, 2017

¹⁴ Letter from William M. Wiltshire, Counsel for DIRECTV Enterprises, LLC, to Marlene H. Dortch, Secretary, FCC, Re: DIRECTV Enterprises LLC, Milestone Completion for DIRECTV11 (Call Sign S2640), File No. SAT-LOA-20040909-00168 (Aug. 19, 2008).

¹⁵ *Minor Mod of S2640*, File No. SAT-MOD-20141029-00117, Stamp Grant at 1, ¶ 2 (Jan. 8, 2015).

**FCC Form 312, Response to Question 40
Officers, Directors, and Ten Percent or Greater Shareholders**

DIRECTV Enterprises, LLC, a Delaware limited liability company, is wholly owned by DIRECTV Holdings, LLC. DIRECTV Holdings, LLC, a Delaware limited liability company, is wholly owned by The DIRECTV Group, Inc., a Delaware corporation. The DIRECTV Group, Inc. is wholly owned by DIRECTV Group Holdings, LLC, a Delaware limited liability company. The address for all of these entities is 2260 E. Imperial Highway, El Segundo, California 90245.

DIRECTV Group Holdings, LLC is a wholly owned subsidiary of AT&T Inc., a Delaware corporation. AT&T Inc. is a publicly traded company, and there is no one person or group that owns 10% or more of the stock of AT&T Inc. The address for AT&T Inc. is 208 S. Akard Street, Dallas, Texas 75202.

The following individuals are officers of DIRECTV Enterprises, LLC:

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|----------------------|---------------------------------------|
| John T. Stankey | President and Chief Executive Officer |
| Brian Paperny | Vice President - Tax |
| Julianne K. Galloway | Treasurer |
| Brian M. Regan | Secretary |
| Sherri L. Bazan | Assistant Treasurer |
| Teresa Blizzard | Assistant Secretary - Tax |
| Karen M. Diorio | Assistant Secretary - Tax |
| Linda A. Fisher | Assistant Secretary - Tax |
| Gary E. Johnson | Assistant Treasurer - Tax |
| Elaine Lou | Assistant Treasurer |
| Stacy W. Roth | Assistant Treasurer |
| Steven Shashack | Assistant Treasurer - Tax |
| Paul M. Wilson | Assistant Secretary |
| Jason Bunch | Executive Director - Payroll |
| Deirdre Scott | Director - Payroll |

Each officer is a U.S. citizen and can be contacted at the following address: DIRECTV Enterprises, LLC, 2260 E. Imperial Highway, El Segundo, CA 90245.