

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
DIRECTV ENTERPRISES, LLC)	File No. SAT-MOD-_____
)	
Application to Modify Authorization for T16)	
(S3039))	
)	

**APPLICATION OF DIRECTV ENTERPRISES, LLC
TO MODIFY AUTHORIZATION FOR T16 (S3039)**

DIRECTV Enterprises, LLC (“DIRECTV”), pursuant to Section 25.117 of the rules of the Federal Communications Commission (“FCC” or “Commission”),¹ hereby requests to modify its authorization for T16 (call sign S3039).² Specifically, DIRECTV seeks authority to change the authorized orbital location of T16 from 102.70° W.L. to 100.85° W.L. and to provide Direct Broadcast Satellite (“DBS”) service using the 12/17 GHz DBS frequency band and Fixed-Satellite Service (“FSS”) using the Ka-FSS frequency band at the nominal 101° W.L. orbital location.

In accordance with the Commission’s rules,³ this application is being filed electronically as an attachment to FCC Form 312. DIRECTV provides the technical information relating to the proposed modification in narrative form pursuant to Section 25.114 of the Commission’s rules.⁴

¹ 47 C.F.R. § 25.117.

² *Satellite Policy Branch Information; Actions Taken*, Public Notice, Report No. SAT-01381, File No. SAT-RPL-20180913-00071 (Mar. 29, 2019).

³ See 47 C.F.R. § 25.117(c).

⁴ 47 C.F.R. § 25.114.

The remainder of the technical information on file with the Commission for T16 (including the technical information submitted on Schedule S) remains unchanged and is incorporated by reference.⁵

I. PROPOSED MODIFICATION AND PUBLIC INTEREST SHOWING

DIRECTV was recently granted authorization to launch and operate T16, a geostationary multi-band, multi-mission satellite, at the nominal 103° W.L. orbital location.⁶ DIRECTV is authorized to provide service using the Ka-FSS and 17/24 GHz portions of the satellite at the nominal 103° W.L. orbital location and to operate the satellite's 12/17 GHz DBS payload for telemetry, tracking, and control ("TT&C") functions only.⁷ DIRECTV seeks modification of the existing authorization to operate T16 at the nominal 101° W.L. orbital location and to provide DBS service using the 12.2-12.7 GHz (space-to-Earth) and 17.3-17.8 GHz (Earth-to-space) Ku-DBS band frequencies and to provide FSS service using the same Ka-FSS band frequencies for which the satellite is currently authorized.⁸ DIRECTV does not seek authority to provide service using the 17/24 GHz frequencies at the 101° W.L. orbital location.

⁵ See IBFS File No. SAT-RPL-20180913-00071.

⁶ *Satellite Policy Branch Information; Actions Taken*, Public Notice, Report No. SAT-01381, File No. SAT-RPL-20180913-00071 (Mar. 29, 2019).

⁷ As explained in the T16 application, T16 has been designed with the capability of performing national Ka-band and 17/24 GHz band transmissions from the nominal 103° W.L. or 99° W.L. locations. T16 also carries a 12/17 GHz DBS payload capable of national transmissions from the nominal 101° W.L., 110° W.L., or 119° W.L. orbital locations. See IBFS File No. SAT-RPL-20180913-00071, Narrative Exhibit at 4 n.8.

⁸ T16 is currently authorized to provide Ka-band service in the 18.3-18.59 GHz and 19.7-20.2 GHz (space-to-Earth) and 28.35-28.6 GHz, 29.25-29.29 GHz, and 29.5-30.0 GHz (Earth-to-space) frequency bands. As with DIRECTV's T8 (Call Sign S2632) and T9S (Call Sign S2669) satellites, T16's Ka-band payload at the nominal 101° W.L. orbital location will be used for backhaul distribution rather than provision of programming directly to subscribers. See IBFS File No. SAT-RPL-20180913-00071, Narrative Exhibit at 2-3 n.6.

Grant of this application will serve the public interest. At the nominal 101° W.L. orbital location, T16 will serve to replace and/or supplement DIRECTV's existing on-orbit capacity of the T8 (call sign S2632),⁹ T9S (call sign S2669),¹⁰ and T4S (call sign S2430)¹¹ satellites.¹² T16 will operate as a replacement satellite using the same DBS frequencies licensed to DIRECTV's T8, T9S, and T4S satellites¹³ and the same Ka-FSS frequencies licensed to DIRECTV's T8 and T9S satellites at this location. The capabilities of the satellite will be carefully integrated with those of DIRECTV's existing on-orbit satellites at the 101° W.L. orbital location in order to optimize the efficient use of valuable spectrum resources at that location and to incorporate redundancy to DIRECTV's high definition ("HD") programming operations. The satellite will give DIRECTV the ability to broadcast a significant number of additional channels of national

⁹ See *Policy Branch Information; Actions Taken*, Public Notice, Report No. SAT-01088, File No. SAT-MOD-20150304-00009 (May 29, 2015). DIRECTV's T8 satellite is currently operating at the 100.75° W.L. orbital location pursuant to a grant of special temporary authority. See *Satellite Policy Branch Information; Actions Taken*, Public Notice, Report No. SAT-01361, File No. SAT-STA-20180928-00077 (Nov. 30, 2018).

¹⁰ See *Policy Branch Information; Actions Taken*, Public Notice, Report No. SAT-01226, File No. SAT-MOD-20161219-00128 (Mar. 24, 2017).

¹¹ See *Policy Branch Information; Actions Taken*, Public Notice, Report No. SAT-00838, File No. SAT-MOD-20111102-00211 (Jan. 20, 2012).

¹² Additionally, DIRECTV's T15 satellite (call sign S2930), which is permanently licensed to operate at 102.75° W.L., is currently providing DBS service using 12/17 GHz DBS frequencies at the 100.85° W.L. orbital location pursuant to a grant of special temporary authority. See *Satellite Policy Branch Information; Actions Taken*, Public Notice, Report No. SAT-01358, File No. SAT-STA-20180830-00064 (Nov. 2, 2018); see also *180-Day STA Extension Request to Operate T15 (Call Sign S2930) at 101 WL*, File No. SAT-STA-20190416-00028.

¹³ As such, this application does not implicate the Commission's freeze on new DBS applications. See *Direct Broadcast Satellite (DBS) Service Auction Nullified: Commission Sets Forth Refund Procedures for Auction No. 52 Winning Bidders and Adopts a Freeze on All New DBS Service Applications*, Public Notice, 20 FCC Rcd 20618 (2005) (clarifying that "[t]he freeze does not apply to *applications for replacement satellites*, modifications to existing satellite licenses, or requests for special temporary authority, unless such applications seek authority to operate on frequencies and/or orbital locations *not previously authorized for operation by that licensee*") (emphases added).

HD programming at the nominal 101° W.L. orbital location. The satellite will also be capable of supporting multiple other missions, which will thereby afford DIRECTV in-orbit redundancy within its satellite fleet.¹⁴

By granting this application, the Commission will enable DIRECTV to continue at the forefront of the development and delivery of HD television services. This capability will allow DIRECTV to maintain its leadership in digital entertainment and innovation and further enhance DIRECTV's ability to compete with incumbent cable operators to provide the best possible programming service to American consumers. The satellite's multi-band, multi-mission capabilities will also provide valuable redundancy to ensure continuity of service to approximately 20 million DIRECTV subscribers in the United States. DIRECTV has begun construction of T16 at its own risk and expects the satellite to be ready for launch in June 2019 and operational approximately two months later.

II. MILESTONES AND BOND

DIRECTV requests grant of this application without milestones or a bond because the Commission's milestone and bond requirements do not apply to DBS service and because T16 will operate as a replacement satellite using the same DBS frequencies and coverage areas as currently licensed to DIRECTV's T8, T9S, and T4S satellites and the same Ka-FSS frequencies

¹⁴ As explained in the T16 application and in footnote 7 above, T16 carries a 12/17 GHz DBS payload capable of national transmissions from the nominal 101° W.L., 110° W.L., or 119° W.L. orbital locations (should it be repositioned to 110° W.L. or 119° W.L. at some time in the future). Additionally, T16 has been designed with the capability of performing national Ka-band and 17/24 GHz band transmissions from the nominal 103° W.L. or 99° W.L. locations (should it be repositioned to either of those locations at some time in the future).

and coverage areas as currently licensed to DIRECTV's T8 and T9S satellites at the nominal 101° W.L. orbital location.¹⁵

III. ITU COST RECOVERY

DIRECTV is aware that processing fees are currently charged by the International Telecommunication Union ("ITU") for satellite filings and that Commission applicants are responsible for any and all fees charged by the ITU.¹⁶ DIRECTV is aware of and unconditionally accepts this requirement and responsibility to pay any ITU cost recovery fees associated with the ITU filings that the Commission makes on behalf of DIRECTV for the satellite relocation proposed in this application.

¹⁵ See 47 C.F.R. §§ 25.164(a), 25.165(a), (e).

¹⁶ See *Implementation of ITU Cost Recovery Charges for Satellite Network Filings*, Public Notice, 16 FCC Rcd 18732 (2001).

IV. CONCLUSION

For the reasons set forth above, DIRECTV respectfully requests that the Commission grant this modification application.

Respectfully submitted,

DIRECTV ENTERPRISES, LLC

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May 8, 2019