

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

In the Matter of)

DIRECTV ENTERPRISES, LLC)

File No. SAT-MOD-_____)

Application to Modify Authorization for T10)
(S2641))

**APPLICATION OF DIRECTV ENTERPRISES, LLC
TO MODIFY AUTHORIZATION FOR T10 (S2641)**

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 T10 (call sign S2641).² Specifically, DIRECTV seeks authority to change the authorized orbital location of T10 from 102.85° W.L. to 102.75° W.L.

In accordance with the Commission’s rules,³ this application is being filed electronically as an attachment to FCC Form 312. Because the satellite will be relocated just 0.10° from its currently authorized orbital location, the technical information on file with the Commission for T10 (including the technical information submitted on Schedule S) remains unchanged and is incorporated by reference.⁴ To the extent necessary, DIRECTV requests that any previously granted technical waivers continue to apply to the operation of T10 at 102.75° W.L.

¹ 47 C.F.R. § 25.117.

² *Policy Branch Information; Actions Taken*, Public Notice, Report No. SAT-01080, File No. SAT-MOD-20150320-00012 (May 1, 2015).

³ See 47 C.F.R. § 25.117(c).

⁴ See IBFS File Nos. SAT-MOD-20150320-00012, SAT-MOD-20091009-00109, SAT-MOD-20070626-00086, SAT-LOA-20040909-00169.

I. PROPOSED MODIFICATION AND PUBLIC INTEREST SHOWING

DIRECTV is implementing certain changes to its existing satellite fleet in connection with the recent launch of DIRECTV's T16 satellite (Call Sign S3039) on June 20, 2019. T10 is a Ka-band satellite operating in the 18.3-18.8 GHz (space-to-Earth) and 28.35-28.6 GHz/29.25-29.5 GHz (Earth-to-space) frequency bands.⁵ On June 6, 2019, the Commission granted DIRECTV's request for special temporary authority to drift T10 from its current location at 102.85° W.L. to 102.75° W.L. and to operate the TT&C and communications frequencies on the T10 satellite at 102.75° W.L. and during the drift from 102.85° W.L. to 102.75° W.L.⁶ By this modification application, DIRECTV seeks authority to permanently change the authorized orbital location of T10 from 102.85° W.L. to 102.75° W.L. DIRECTV's T15 satellite (Call Sign S2930) is permanently authorized to operate at 102.75° W.L.⁷ but is currently operating at 100.85° W.L. pursuant to a grant of special temporary authority.⁸ DIRECTV is simultaneously filing a separate modification application to permanently change the authorized orbital location of T15 from 102.75° W.L. to 102.85° W.L.

Grant of this relocation request will not result in increased risk of harmful interference.

DIRECTV will operate T10's TT&C and communications frequencies at 102.75° W.L. in

⁵ T10's telemetry, tracking, and command ("TT&C") frequencies are 18300.25 MHz and 18300.75 MHz (space-to-Earth) and 29251.0 MHz and 29493.0 MHz (Earth-to-space).

⁶ See *Satellite Policy Branch Information; Actions Taken*, Public Notice, Report No. SAT-01395, File No. SAT-STA-20190531-00043 (June 7, 2018).

⁷ See *Policy Branch Information; Actions Taken*, Public Notice, Report No. SAT-01086, File No. SAT-LOA-20140825-00094 (May 22, 2015); *Policy Branch Information; Actions Taken*, Public Notice, Report No. SAT-01084, File No. SAT-MOD-20140612-00066 (May 15, 2015). T15's 17/24 GHz BSS band payload was originally authorized under Call Sign S2712, which was consolidated with Call Sign S2930 in September 2017.

⁸ See *Satellite Policy Branch Information; Actions Taken*, Public Notice, Report No. SAT-01395, File No. SAT-STA-20190416-00028 (June 7, 2019).

conformance with FCC rules and DIRECTV's coordination agreements concerning the nominal 103° W.L. orbital location. DIRECTV will operate T10 at 102.75° W.L. in accordance with all previously imposed FCC conditions.

Grant of this application will serve the public interest because it will facilitate DIRECTV's fleet management operations in connection with the recent launch of DIRECTV's T16 satellite, which will extend coverage, improve service performance, and provide additional capacity to DIRECTV customers.

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 satellites that are already in-orbit and operating.⁹

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.¹⁰ 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.

⁹ See, e.g., *Intelsat License LLC, Modification Application to Redeploy and Operate Intelsat 16 at 58.1° W.L.*, File No. SAT-MOD-20160201-00009, Condition No. 12 (stamp grant May 18, 2016) ("Because Intelsat 16 is already in-orbit and operating, grant of authority to operate Intelsat 16 at 58.1° W.L. is not subject to milestone conditions and Intelsat is not required to post a bond. As such, waiver of Sections 25.164(a) and 25.165 of the Commission's rules is not necessary.").

¹⁰ 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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