

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

)	
In the Matter of)	
DIRECTV ENTERPRISES, LLC)	File No. SAT-MOD-_____
)	
Application to Modify Authorization for T15)	
(S2930))	
)	

**APPLICATION OF DIRECTV ENTERPRISES, LLC
TO MODIFY AUTHORIZATION FOR T15 (S2930)**

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 T15 (call sign S2930).² Specifically, DIRECTV seeks authority to change the authorized orbital location of T15 from 102.75° W.L. to 102.85° 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 T15 (including the technical information submitted on Schedule S) remains unchanged and is

¹ 47 C.F.R. § 25.117.

² *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).

³ See 47 C.F.R. § 25.117(c).

incorporated by reference.⁴ To the extent necessary, DIRECTV requests that any previously granted technical waivers continue to apply to the operation of T15 at 102.85° W.L.

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. T15 is a multi-band, multi-mission satellite designed to operate at any of DIRECTV's currently licensed Ka-band, 17/24 GHz BSS, or 12/17 GHz DBS orbital locations. At the nominal 103° W.L. orbital location, T15 operates in the 18.3-18.59/19.7-20.2 GHz (space-to-Earth) and 28.35-28.6/29.25-29.29/29.5-30.0 GHz (Earth-to-space) Ka-band frequency bands and the 17.3-17.7 GHz (space-to-Earth) and 24.75-25.15 GHz (Earth-to-space) 17/24 GHz BSS frequency bands.⁵ T15 is permanently authorized to operate at 102.75° W.L. but is currently operating at 100.85° W.L. pursuant to a grant of special temporary authority.⁶ By this modification application, DIRECTV seeks authority to permanently change the authorized orbital location of T15 from 102.75° W.L. to 102.85° W.L. DIRECTV's T10 satellite (Call Sign S2641) is permanently authorized to operate at 102.85° W.L. but will be relocated to 102.75° W.L. pursuant to a grant

⁴ See IBFS File Nos. SAT-MOD-20150722-00052, SAT-LOA-20140825-00094; SAT-MOD-20140612-00066, SAT-MOD-20140624-00075, SAT-MOD-20140612-00067, SAT-MOD-20111128-00229, SAT-MOD-20110727-00136, SAT-LOA-20060908-00100.

⁵ 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.

⁶ See *Satellite Policy Branch Information; Actions Taken*, Public Notice, Report No. SAT-01395, File No. SAT-STA-20190416-00028 (June 7, 2019).

of special temporary authority issued by the Commission on June 6, 2019.⁷ DIRECTV is simultaneously filing a separate modification application to permanently change the authorized orbital location of T10 from 102.85° W.L. to 102.75° W.L.

Upon receipt of Commission approval, DIRECTV expects to begin drifting T15 to 102.85° W.L. as early as September 16, 2019. The drift is expected to take approximately eight days. During the drift period, DIRECTV will utilize only the satellite's telemetry, tracking, and command ("TT&C") frequencies and will follow industry practices for coordinating TT&C transmission during the relocation process. T15's specific TT&C frequencies are as follows:

- 29502.5 MHz and 29505.9 MHz (Earth-to-space); and
- 20198.5 MHz and 20199.5 MHz (space-to-Earth).

Grant of this relocation request will not result in increased risk of harmful interference. As noted above, DIRECTV will operate only the above-listed TT&C frequencies during the drift and will coordinate T15's TT&C transmissions with operators of satellites in the drift path. In the unlikely event that any interference should occur during the drift, DIRECTV will take all reasonable steps to eliminate such interference. DIRECTV will operate T15's Ka-band and 17/24 GHz BSS communications payloads and TT&C frequencies at 102.85° W.L. in conformance with FCC rules and DIRECTV's coordination agreements concerning the nominal 103° W.L. orbital location. DIRECTV will operate T15 at 102.85° 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

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

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.⁸

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.⁹ 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.

⁸ 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.").

⁹ 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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