

S2930 SAT-MOD-20190625-00051 IB2019002523
DIRECTV Enterprises, LLC
T15



File # SAT-MOD-20190625-00051
Call Sign S2930 Grant Date 08/14/19
(or other identifier)
Term Dates
From 08/14/19 To: 08/25/30
Approved: Stephen J. Duall
Stephen J. Duall
Chief, Satellite Policy Branch

Approved by OMB
3060-0678

Date & Time Filed: Jun 25 2019 2:36:02:926PM
File Number: SAT-MOD-20190625-00051

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| FCC APPLICATION FOR SPACE AND EARTH STATION:MOD OR AMD – MAIN FORM | FCC Use Only |
| FCC 312 MAIN FORM FOR OFFICIAL USE ONLY | |


APPLICANT INFORMATION

Enter a description of this application to identify it on the main menu:
Modification Application to Change T15 Orbital Location (Call Sign S2930)

1-8. Legal Name of Applicant

| | | | |
|-------------------|------------------------------------|----------------------|-----------------|
| Name: | DIRECTV Enterprises, LLC | Phone Number: | 310-964-4996 |
| DBA Name: | | Fax Number: | |
| Street: | 1120 20th Street, NW Suite 1000 | E-Mail: | spdulac@att.com |
| City: | Washington | State: | DC |
| Country: | USA | Zipcode: | 20036 - |
| Attention: | Steve Dulac | | |

ATTACHMENT TO GRANT
DIRECTV Enterprises, LLC
IBFS File No. SAT-MOD-20190625-00051

| | | |
|--|--|---|
| IBFS File No(s): | SAT-MOD-20190625-00051 | <p>GRANTED – With Conditions</p>  <p>International Bureau Satellite Division</p> |
| Licensee/Grantee: | DIRECTV Enterprises, LLC (DIRECTV) | |
| Call Sign: | S2930 | |
| Satellite Name: | T15 (formerly DIRECTV 15 & RB-2) ¹ | |
| Orbital Location: (required station- keeping tolerance) | 102.85° W.L. (± 0.025 degrees) | |
| Administration: | United States of America | |
| Nature of Service: | Fixed-Satellite Service (FSS), 17/24 GHz Broadcast Satellite Service (BSS) | |
| Scope of Grant: | Authority to specify operations at the 102.85° W.L. orbital location instead of the previously authorized orbital location of 102.75° W.L.; to provide FSS service and 17/24 GHz BSS service at 102.85° W.L.; and to conduct TT&C necessary to drift T15 to 102.85° W.L. | |
| Previous Grants: | <p>Grant of a 30-day extension of the launch and begin operations milestone applicable to DIRECTV RB-2. <i>See</i> IBFS File No. SAT-MOD-20150722-00052 (granted Sept. 2, 2015)</p> <p>Authority to operate DIRECTV 15 at 102.75° W.L. to provide FSS, including direct-to-home services. <i>See</i> IBFS File Nos. SAT-LOA-20140825-00094 & SAT-AMD-20150407-00018 (granted May 20, 2015)</p> <p>Modification of the license for DIRECTV RB-2, in order to conform the parameters of its authorization with the satellite as constructed and to permit operations at the 102.75° W.L. orbital location, instead of the currently authorized orbital location of 102.825° W.L. <i>See</i> IBFS File No. SAT-MOD-20140612-00066 (granted May 14, 2015)</p> <p>Extension of milestone to launch and commence operations for DIRECTV RB-2. <i>See</i> IBFS File No. SAT-MOD-20140624-00075, DA 15-589 (IB 2015)</p> <p>Modification of the license for DIRECTV RB-2 to demonstrate compliance with the technical rules and information requirements adopted in the 17/24 GHz BSS Second Report and Order, FCC 11-93, 26 FCC Rcd 8927 (2011). SAT-MOD-20140612-00067 (granted Nov. 20, 2014)</p> <p>Modification of the license for DIRECTV RB-2 at 102.825° W.L. to demonstrate compliance with the technical rules and information requirements adopted in FCC 11-93, 26 FCC Rcd 8927 (2011). <i>See</i> IBFS File Nos. SAT-MOD-20111128-00229 & SAT-AMD-20120314-00041 (granted May 24, 2012)</p> <p>Modification of license for DIRECTV RB-2 to expand the coverage area to include Puerto Rico. <i>See</i> IBFS File No. SAT-MOD-20110727-00136 (granted Oct. 26, 2011)</p> <p>Authority to launch and operate DIRECTV RB-2 in the 17/24 GHz Broadcasting Satellites Service at 102.825° W.L. <i>See</i> IBFS File No. SAT-LOA-20060908-00100, SAT-AMD-20080114-00014 & SAT-AMD-20080321-00077, 24 FCC Rcd 9393 (IB 2009), <i>pet. for recon. denied.</i></p> | |
| Service Area(s): | CONUS, Alaska, Hawaii, Puerto Rico | |

¹ The RB-2 payload on DIRECTV 15 was originally authorized and operated under Call Sign S2712, but in September 2017 it was consolidated into Call Sign S2930 (the Call Sign assigned to DIRECTV 15).


ATTACHMENT TO GRANT
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| Frequencies: | <p><u>17/24 GHz BSS</u> 17.3-17.7 GHz (space-to-Earth) 24.75-25.15 GHz (Earth-to-space)</p> <p><u>FSS²</u> 18.3-18.59 GHz (space-to-Earth) 19.7-20.2 GHz (space-to-Earth) 28.35-28.6 GHz (Earth-to-space) 29.25-29.29 GHz (Earth-to-space) 29.5-30.0 GHz (Earth-to-space)</p> <p><u>Telemetry, Tracking, and Command</u> 20.1985 GHz and 20.1995 GHz (space-to-Earth) 29.5025 GHz and 29.5059 GHz (Earth-to-space)</p> |
| <p>Unless otherwise specified herein, operations under this grant must comport with the legal and technical specifications set forth by the applicant or petitioner and with Federal Communication Commission's rules not waived herein. This grant is also subject to the following conditions:</p> <ol style="list-style-type: none"> 1. DIRECTV must continue to operate the T15 space station at the 102.85° W.L. orbital location subject to the conditions in prior grants.³ 2. DIRECTV must maintain the T15 space station at the 101.2° W.L. orbital location with an east/west longitudinal station-keeping tolerance of ± 0.05 degrees. 3. Operations during the drift to 102.85° W.L. must be on an unprotected and non-harmful interference basis, i.e. the T15 space station must not cause harmful interference to, and DIRECTV must not claim protection from interference caused to it by, any other lawfully operating station. In the event of any harmful interference, DIRECTV must cease operations immediately upon notification of such interference, and must inform the Commission, in writing, immediately of such an event. 4. DIRECTV must coordinate the operations of T15 during the drift to 102.85° W.L. with existing geostationary space stations to ensure that no unacceptable interference results from its operations 5. DIRECTV must file with the Commission the information required by section 25.172 of the Commission's rules, 47 CFR § 25.172. 6. Nothing in this grant changes the license term for the T15 space station (Call Sign S2930), which expires on August 25, 2030. | |
| <p>Licensee/grantee is afforded thirty (30) days from the date of release of this action to decline the grant as conditioned. Failure to respond within this period will constitute formal acceptance of the grant as conditioned.</p> <p>This action is taken pursuant to Section 0.261 of the Commission's rules on delegated authority, 47 C.F.R. § 0.261, and is effective upon release.</p> <p>Station licenses are subject to the conditions specified in Section 309(h) of the Communications Act of 1934, as amended, 47 U.S.C. § 309(h).</p> | |

² T15 is authorized to use the 18.3-18.59 GHz (space-to-Earth) and 28.35-28.6 GHz, 29.25-29.29 (Earth-to-space) frequency bands, but these frequencies will be used for backhaul rather than direct provision of service to subscribers.

³ See Previous Grants

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IBFS File No. SAT-MOD-20190625-00051

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|---------------------|---|----------------------------|
| Action Date: | August 14, 2019 | |
| Term Dates | From: August 14, 2019 | To: August 25, 2030 |
| Approved: |  Stephen J. Duall Chief, Satellite Policy Branch | |

9-16. Name of Contact Representative

| | | | |
|-------------------|--------------------|----------------------|-----------------------|
| Name: | Jennifer D. Hindin | Phone Number: | 202-719-4975 |
| Company: | Wiley Rein LLP | Fax Number: | 202-719-7049 |
| Street: | 1776 K Street, NW | E-Mail: | jhindin@wileyrein.com |
| City: | Washington | State: | DC |
| Country: | USA | Zipcode: | 20006- |
| Attention: | | Relationship: | Legal Counsel |

CLASSIFICATION OF FILING

17. Choose the button next to the classification that applies to this filing for both questions a. and b. Choose only one for 17a and only one for 17b.

- a1. Earth Station
- a2. Space Station

- (N/A) b1. Application for License of New Station
- (N/A) b2. Application for Registration of New Domestic Receive-Only Station
- b3. Amendment to a Pending Application
- b4. Modification of License or Registration
- b5. Assignment of License or Registration
- b6. Transfer of Control of License or Registration
- b7. Notification of Minor Modification
- (N/A) b8. Application for License of New Receive-Only Station Using Non-U.S. Licensed Satellite
- (N/A) b9. Letter of Intent to Use Non-U.S. Licensed Satellite to Provide Service in the United States
- (N/A) b10. Other (Please specify)
- (N/A) b11. Application for Earth Station to Access a Non-U.S. satellite Not Currently Authorized to Provide the Proposed Service in the Proposed Frequencies in the United States
- (N/A) b12. Application for Database Entry
- b13. Amendment to a Pending Database Entry Application
- b14. Modification of Database Entry

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| <p>17c. Is a fee submitted with this application?</p> <p><input checked="" type="radio"/> If Yes, complete and attach FCC Form 159. If No, indicate reason for fee exemption (see 47 C.F.R. Section 1.1114).</p> <p><input type="radio"/> Governmental Entity <input type="radio"/> Noncommercial educational licensee</p> <p><input type="radio"/> Other (please explain):</p> | |
| <p>17d.</p> <p>Fee Classification BFY – Space Station Modification (Geostationary)</p> | |
| <p>18. If this filing is in reference to an existing station, enter:</p> <p>(a) Call sign of station: S2930</p> | <p>19. If this filing is an amendment to a pending application enter both fields, if this filing is a modification please enter only the file number:</p> <p>(a) Date pending application was filed:</p> <p>(b) File number: SATLOA2014082500094</p> |

TYPE OF SERVICE

20. NATURE OF SERVICE: This filing is for an authorization to provide or use the following type(s) of service(s): Select all that apply:

- a. Fixed Satellite
- b. Mobile Satellite
- c. Radiodetermination Satellite
- d. Earth Exploration Satellite
- e. Direct to Home Fixed Satellite
- f. Digital Audio Radio Service
- g. Other (please specify) 17/24 GHz Broadcasting-Satellite Service

21. STATUS: Choose the button next to the applicable status. Choose only one.

- Common Carrier Non-Common Carrier

22. If earth station applicant, check all that apply.

- Using U.S. licensed satellites
- Using Non-U.S. licensed satellites

23. If applicant is providing INTERNATIONAL COMMON CARRIER service, see instructions regarding Sec. 214 filings. Choose one. Are these facilities:

- Connected to a Public Switched Network Not connected to a Public Switched Network N/A

24. FREQUENCY BAND(S): Place an 'X' in the box(es) next to all applicable frequency band(s).

- a. C-Band (4/6 GHz) b. Ku-Band (12/14 GHz)
- c. Other (Please specify upper and lower frequencies in MHz.)
Frequency Lower: 17300 Frequency Upper: 30000 (Please specify additional frequencies in an attachment)

TYPE OF STATION

25. CLASS OF STATION: Choose the button next to the class of station that applies. Choose only one.

- a. Fixed Earth Station
- b. Temporary-Fixed Earth Station
- c. 12/14 GHz VSAT Network
- d. Mobile Earth Station
- e. Geostationary Space Station
- f. Non-Geostationary Space Station
- g. Other (please specify)

26. TYPE OF EARTH STATION FACILITY:

- Transmit/Receive Transmit-Only Receive-Only N/A

"For Space Station applications, select N/A."

PURPOSE OF MODIFICATION

27. The purpose of this proposed modification is to: (Place an 'X' in the box(es) next to all that apply.)

- a -- authorization to add new emission designator and related service
- b -- authorization to change emission designator and related service
- c -- authorization to increase EIRP and EIRP density
- d -- authorization to replace antenna
- e -- authorization to add antenna
- f -- authorization to relocate fixed station
- g -- authorization to change frequency(ies)
- h -- authorization to add frequency
- i -- authorization to add Points of Communication (satellites & countries)
- j -- authorization to change Points of Communication (satellites & countries)
- k -- authorization for facilities for which environmental assessment and radiation hazard reporting is required
- l -- authorization to change orbit location
- m -- authorization to perform fleet management
- n -- authorization to extend milestones
- o -- Other (Please specify)

ENVIRONMENTAL POLICY

28. Would a Commission grant of any proposal in this application or amendment have a significant environmental impact as defined by 47 CFR 1.1307? If YES, submit the statement as required by Sections 1.1308 and 1.1311 of the Commission's rules, 47 C.F.R. 1.1308 and 1.1311, as an exhibit to this application. A Radiation Hazard Study must accompany all applications for new transmitting facilities, major modifications, or major amendments. Yes No

ALIEN OWNERSHIP Earth station applicants not proposing to provide broadcast, common carrier, aeronautical en route or aeronautical fixed radio station services are not required to respond to Items 30–34.

29. Is the applicant a foreign government or the representative of any foreign government? Yes No

30. Is the applicant an alien or the representative of an alien? Yes No N/A

31. Is the applicant a corporation organized under the laws of any foreign government? Yes No N/A

32. Is the applicant a corporation of which more than one-fifth of the capital stock is owned of record or voted by aliens or their representatives or by a foreign government or representative thereof or by any corporation organized under the laws of a foreign country? Yes No N/A

33. Is the applicant a corporation directly or indirectly controlled by any other corporation of which more than one-fourth of the capital stock is owned of record or voted by aliens, their representatives, or by a foreign government or representative thereof or by any corporation organized under the laws of a foreign country?

Yes No N/A

34. If any answer to questions 29, 30, 31, 32 and/or 33 is Yes, attach as an exhibit an identification of the aliens or foreign entities, their nationality, their relationship to the applicant, and the percentage of stock they own or vote.

BASIC QUALIFICATIONS

35. Does the Applicant request any waivers or exemptions from any of the Commission's Rules?
If Yes, attach as an exhibit, copies of the requests for waivers or exceptions with supporting documents.

Yes No

36. Has the applicant or any party to this application or amendment had any FCC station authorization or license revoked or had any application for an initial, modification or renewal of FCC station authorization, license, or construction permit denied by the Commission? If Yes, attach as an exhibit, an explanation of circumstances.

Yes No

37. Has the applicant, or any party to this application or amendment, or any party directly or indirectly controlling the applicant ever been convicted of a felony by any state or federal court? If Yes, attach as an exhibit, an explanation of circumstances.

Yes No

38. Has any court finally adjudged the applicant, or any person directly or indirectly controlling the applicant, guilty of unlawfully monopolizing or attempting unlawfully to monopolize radio communication, directly or indirectly, through control of manufacture or sale of radio apparatus, exclusive traffic arrangement or any other means or unfair methods of competition? If Yes, attach as an exhibit, an explanation of circumstances

Yes No

39. Is the applicant, or any person directly or indirectly controlling the applicant, currently a party in any pending matter referred to in the preceding two items? If yes, attach as an exhibit, an explanation of the circumstances.

Yes No

40. If the applicant is a corporation and is applying for a space station license, attach as an exhibit the names, address, and citizenship of those stockholders owning a record and/or voting 10 percent or more of the Filer's voting stock and the percentages so held. In the case of fiduciary control, indicate the beneficiary(ies) or class of beneficiaries. Also list the names and addresses of the officers and directors of the Filer.

Question 40

41. By checking Yes, the undersigned certifies, that neither applicant nor any other party to the application is subject to a denial of Federal benefits that includes FCC benefits pursuant to Section 5301 of the Anti-Drug Act of 1988, 21 U.S.C. Section 862, because of a conviction for possession or distribution of a controlled substance. See 47 CFR 1.2002(b) for the meaning of "party to the application" for these purposes.

Yes No

42a. Does the applicant intend to use a non-U.S. licensed satellite to provide service in the United States? If Yes, answer 42b and attach an exhibit providing the information specified in 47 C.F.R. 25.137, as appropriate. If No, proceed to question 43.

Yes No

42b. What administration has licensed or is in the process of licensing the space station? If no license will be issued, what administration has coordinated or is in the process of coordinating the space station?

43. Description. (Summarize the nature of the application and the services to be provided). (If the complete description does not appear in this box, please go to the end of the form to view it in its entirety.)

DIRECTV Enterprises, LLC seeks to modify its authorization for T15 (Call Sign S2930) to change the authorized orbital location from 102.75 WL to 102.85 WL.

Narrative

43a. Geographic Service Rule Certification

By selecting A, the undersigned certifies that the applicant is not subject to the geographic service or geographic coverage requirements specified in 47 C.F.R. Part 25.

A

By selecting B, the undersigned certifies that the applicant is subject to the geographic service or geographic coverage requirements specified in 47 C.F.R. Part 25 and will comply with such requirements.

B

By selecting C, the undersigned certifies that the applicant is subject to the geographic service or geographic coverage requirements specified in 47 C.F.R. Part 25 and will not comply with such requirements because it is not feasible as a technical matter to do so, or that, while technically feasible, such services would require so many compromises in satellite design and operation as to make it economically unreasonable. A narrative description and technical analysis demonstrating this claim are attached.

C

CERTIFICATION

The Applicant waives any claim to the use of any particular frequency or of the electromagnetic spectrum as against the regulatory power of the United States because of the previous use of the same, whether by license or otherwise, and requests an authorization in accordance with this application. The applicant certifies that grant of this application would not cause the applicant to be in violation of the spectrum aggregation limit in 47 CFR Part 20. All statements made in exhibits are a material part hereof and are incorporated herein as if set out in full in this application. The undersigned, individually and for the applicant, hereby certifies that all statements made in this application and in all attached exhibits are true, complete and correct to the best of his or her knowledge and belief, and are made in good faith.

44. Applicant is a (an): (Choose the button next to applicable response.)

- Individual
- Unincorporated Association
- Partnership
- Corporation
- Governmental Entity
- Other (please specify)

45. Name of Person Signing
Steve Dulac

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46. Title of Person Signing
Director, Content Technology & Regulatory Policy

WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND / OR IMPRISONMENT
(U.S. Code, Title 18, Section 1001), AND/OR REVOCATION OF ANY STATION AUTHORIZATION
(U.S. Code, Title 47, Section 312(a)(1)), AND/OR FORFEITURE (U.S. Code, Title 47, Section 503).

FCC NOTICE REQUIRED BY THE PAPERWORK REDUCTION ACT

The public reporting for this collection of information is estimated to average 2 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the required data, and completing and reviewing the collection of information. If you have any comments on this burden estimate, or how we can improve the collection and reduce the burden it causes you, please write to the Federal Communications Commission, AMD-PERM, Paperwork Reduction Project (3060-0678), Washington, DC 20554. We will also accept your comments regarding the Paperwork Reduction Act aspects of this collection via the Internet if you send them to PRA@fcc.gov. PLEASE DO NOT SEND COMPLETED FORMS TO THIS ADDRESS.

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THE FOREGOING NOTICE IS REQUIRED BY THE PAPERWORK REDUCTION ACT OF 1995, PUBLIC LAW 104-13, OCTOBER 1, 1995, 44 U.S.C. SECTION 3507.

**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

By: /s/ Steve Dulac

Steve Dulac

Director, Content Technology & Regulatory
Policy

Of Counsel:

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June 25, 2019