

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

)	
In the Matter of)	
DIRECTV ENTERPRISES, LLC)	File No. SAT-MOD-_____
)	
Application to Modify Authorization for T9S)	
(S2669))	
)	

**APPLICATION OF DIRECTV ENTERPRISES, LLC
TO MODIFY AUTHORIZATION FOR T9S (S2669)**

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 T9S (call sign S2669).² Specifically, DIRECTV seeks authority to change the authorized orbital location of T9S from 101.1° W.L. to 101.2° 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 T9S (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 T9S at 101.2° W.L.

¹ 47 C.F.R. § 25.117.

² *Policy Branch Information; Actions Taken*, Public Notice, Report No. SAT-01226, File No. SAT-MOD-20161219-00128 (Mar. 24, 2017).

³ See 47 C.F.R. § 25.117(c).

⁴ See IBFS File Nos. SAT-MOD-20161219-00128, SAT-MOD-20060908-00101, SAT-AMD-20060918-00102, SAT-LOA-20051123-00250, SAT-RPL-20050322-00070.

I. PROPOSED MODIFICATION AND PUBLIC INTEREST SHOWING

T9S is a hybrid satellite authorized to operate in the Ku-DBS (12.2-12.7 GHz (space-to-Earth) and 17.3-17.8 GHz (Earth-to-space)) and Ka-Band (18.3-18.8/19.7-20.2 GHz (space-to-Earth) and 28.35-28.6/29.25-29.5/29.5-30.0 GHz (Earth-to-space)) frequency bands. T9S is permanently authorized to operate at 101.1° W.L.⁵ DIRECTV's T4S satellite (Call Sign S2430) is permanently authorized to operate at 101.2° W.L.⁶ T4S is approaching the end of its operational life, and DIRECTV plans to deorbit the satellite later this year. In connection with the deorbiting of T4S, DIRECTV plans to relocate T9S to 101.2° W.L. and to transfer all traffic from T4S to T9S. DIRECTV is simultaneously filing an application for special temporary authority to drift T9S from 101.1° W.L. to 101.2° W.L. and to operate the satellite at 101.2° W.L.⁷ By this modification application, DIRECTV seeks to permanently change the authorized orbital location of T9S from 101.1° W.L. to 101.2° W.L.

Grant of this relocation request will not result in increased risk of harmful interference. DIRECTV will operate T9S at 101.2° W.L. using the same Ku-DBS and Ka-Band frequencies already licensed to T9S at the nominal 101° W.L. orbital location.⁸ DIRECTV will operate T9S

⁵ See *Policy Branch Information; Actions Taken*, Public Notice, Report No. SAT-01226, File No. SAT-MOD-20161219-00128 (Mar. 24, 2017).

⁶ See *Policy Branch Information; Actions Taken*, Public Notice, Report No. SAT-00838, File No. SAT-MOD-20111102-00211 (Jan. 20, 2012).

⁷ Once relocated, T9S will initially be collocated with T4S for approximately six weeks while traffic is transferred from T4S to T9S, and T4S will then be deorbited.

⁸ Because DIRECTV will provide DBS service using 12/17 GHz frequency bands already assigned to DIRECTV for use at the nominal 101° W.L. orbital location, this application for special temporary authority 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

at 101.2° W.L. in conformance with FCC rules and DIRECTV’s coordination agreements concerning the nominal 101° W.L. orbital location. DIRECTV will operate T9S at 101.2° W.L. in accordance with all previously imposed FCC conditions.

Grant of this application will serve the public interest because it will facilitate the transfer of traffic from T4S to T9S in connection with the decommissioning of DIRECTV’s T4S satellite, thereby ensuring continuing service coverage 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

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*) (emphasis added).

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).

associated with the ITU filings that the Commission makes on behalf of DIRECTV for the satellite relocation proposed in this application.

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:

Jennifer D. Hindin
Daniel P. Brooks
WILEY REIN LLP
1776 K Street, NW
Washington, DC 20006
Tel: (202) 719-7000
Fax: (202) 719-7049
jhindin@wileyrein.com
dbrooks@wileyrein.com

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