

**EXHIBIT 1**  
**REQUEST TO MODIFY AUTHORIZATION FOR SPACEWAY 2**

DIRECTV Enterprises, LLC (“DIRECTV”), pursuant to Section 25.117 of the rules of the Federal Communications Commission (“Commission” or “FCC”), 47 C.F.R. § 25.117, hereby seeks to modify its authorization for the SPACEWAY 2 satellite (Call Sign S2133) at the 138.9° W.L. orbital location. Specifically, this modification application seeks authority to extend the SPACEWAY 2 license term for an additional seven years, through January 31, 2028.

In accordance with the Commission’s rules,<sup>1</sup> this application has been filed electronically as an attachment to FCC Form 312. The technical information on file with the Commission for the SPACEWAY 2 satellite is unchanged and incorporated by reference.<sup>2</sup> To the extent necessary, DIRECTV requests that previously granted technical waivers continue to apply to operation of SPACEWAY 2.<sup>3</sup> Consistent with Section 1.62 of the Commission’s rules, DIRECTV will continue to operate SPACEWAY 2 pursuant to the terms and conditions of its license until such time as the Commission makes a determination with respect to this Application for license extension.

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<sup>1</sup> 47 C.F.R. § 25.117(c).

<sup>2</sup> See File Nos. SAT-MOD-20200221-00017, SAT-MOD-20141029-00116, SAT-MOD-20071010-00137, SAT-MOD-20041122-00212, SAT-MOD-20040614-00113.

<sup>3</sup> In 2004, the Commission granted waivers for SPACEWAY 2 of 47 C.F.R. § 25.210(c) (Capability to Change Transponder Saturation Flux Density) and 47 C.F.R. § 25.210(i) (Cross-Polarization Isolation). See *Spaceway First Modification 99 WL*, File No. SAT-MOD-20040614-00113 (stamp grant Nov. 4, 2004). Due to changes in these Part 25 rules, waivers are no longer required. The Commission also granted DIRECTV a waiver of the requirement to provide certain information in Schedule S. See *id.*

## I. EXTENSION OF LICENSE TERM

DIRECTV seeks to extend the license term for the SPACEWAY 2 satellite through January 31, 2028. The SPACEWAY 2 satellite was placed into service on April 14, 2006,<sup>4</sup> and commenced inclined orbit operations on April 13, 2020.<sup>5</sup> Pursuant to Sections 25.121(a)(1) and (d)(1) of the Commission’s rules, the license term for SPACEWAY 2 will expire on April 14, 2021.<sup>6</sup> This expiration date is well before the expected end of service life of January 31, 2028.<sup>7</sup> After the expiration of this first renewal term, DIRECTV will seek an additional license term extension to cover any remaining service life of the spacecraft.

The extension of SPACEWAY 2 will not affect the satellite’s post-mission disposal plan. As approved previously, at the end of the SPACEWAY 2 mission, DIRECTV will dispose of the satellite by moving it to an altitude of at least 267.6 kilometers above the geostationary arc. For that purpose, DIRECTV has reserved 3.94 kilograms of propellant.<sup>8</sup>

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<sup>4</sup> See Letter from Counsel for DIRECTV to Marlene H. Dortch, Secretary, FCC, File No. SAT-MOD-20050610-00119 (Apr. 20, 2006) (“*Certification of Operation Letter*”).

<sup>5</sup> See Letter from Daniel P. Brooks, Counsel for DIRECTV, to Marlene H. Dortch, Secretary, FCC, File No. SAT-MOD-20200221-00017 (Apr. 14, 2020) (“*Inclined Orbit Letter*”).

<sup>6</sup> 47 C.F.R. § 25.121(a)(1), (d)(1); see also *Policy Branch Information; Actions Taken*, Report No. SAT-01062, File No. SAT-MOD-20141029-00116 (Jan. 9, 2015) (Public Notice) (“*Relocation Modification*”).

<sup>7</sup> See *Inclined Orbit Letter*. As a result of inclined orbit operations, the expected remaining life of the SPACEWAY 2 satellite is at least an additional seven years and thus DIRECTV seeks an extension until January 31, 2028. The FCC’s five year renewal period adopted in the *Orbital Debris Mitigation* proceeding is not yet in effect. See 47 C.F.R. § 25.121(b) (permitting applicants to seek renewals for up to 15 years); see also *Mitigation of Orbital Debris in the New Space Age*, Report and Order, 85 Fed. Reg. 52422, 52440 (Aug. 25, 2020).

<sup>8</sup> See *DIRECTV Enterprises, LLC, Modification to Relocate SPACEWAY 2 (S2133) to 138.9 WL*, File No. SAT-MOD-20200221-00017 (filed Feb. 21, 2020).

## **II. PUBLIC INTEREST SHOWING**

Grant of this modification application to extend the license term of SPACEWAY 2 is in the public interest. SPACEWAY 2 provides service primarily to the state of Alaska and serves as Ka-band backup capacity for the C-band capacity currently used by AT&T Alaska. AT&T Alaska uses satellite capacity to provide telephony services to locations throughout Alaska, including those that cannot be reached by traditional wireline and terrestrial services.

Grant of this modification application to extend the license term will serve the public interest by enabling customers to continue receiving service from SPACEWAY 2. Extending the license term will also promote the continued efficient use of orbital resources and is consistent with recent decisions by the Commission to extend satellite license terms.<sup>9</sup> There are no single points of failure on SPACEWAY 2 that would result in an inability to de-orbit the satellite. Additionally, the satellite's TT&C functions are operating nominally. DIRECTV intends to eventually decommission the spacecraft in accordance with its Orbital Debris Mitigation Plan.

## **III. REQUEST FOR GRANT WITHOUT MILESONES OR A BOND**

Because SPACEWAY 2 is already in-orbit and operating, grant of this modification application is not subject to milestone conditions, and DIRECTV is not required to post a bond under Sections 25.164(a) and 25.165 of the Commission's rules.<sup>10</sup>

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<sup>9</sup> See, e.g., *Policy Branch Information; Actions Taken*, Report No. SAT-01156, File No. SAT-MOD-20160219-00019 (May 6, 2016) (Public Notice) (granting license extension for Intelsat 1R, a station-kept satellite, based on the satellite's current projected end of service including future inclination).

<sup>10</sup> See 47 C.F.R. §§ 25.164(a) and 25.165.

#### **IV. CONCLUSION**

For the reasons set forth above, DIRECTV respectfully requests that the Commission grant this modification application extend the license term for SPACEWAY 2.

**FCC Form 312, Response to Question 40**  
**Officers, Directors, and Ten Percent or Greater Shareholders**

DIRECTV Enterprises, LLC, a Delaware limited liability company, is wholly owned by DIRECTV Holdings, LLC. DIRECTV Holdings, LLC, a Delaware limited liability company, is wholly owned by The DIRECTV Group, Inc., a Delaware corporation. The DIRECTV Group, Inc. is wholly owned by DIRECTV Group Holdings, LLC, a Delaware limited liability company. The address for all of these entities is 2260 E. Imperial Highway, El Segundo, California 90245.

DIRECTV Group Holdings, LLC is a wholly owned subsidiary of AT&T Inc., a Delaware corporation. AT&T Inc. is a publicly traded company, and there is no one person or group that owns 10% or more of the stock of AT&T Inc. The address for AT&T Inc. is 208 S. Akard Street, Dallas, Texas 75202.

The following individuals are officers of DIRECTV Enterprises, LLC:

David Christopher	President and Chief Executive Officer
Gary E. Johnson	Vice President - Tax
Brian Paperny	Vice President - Tax
Jeston B. Dumas	Treasurer
Brian M. Regan	Secretary
Teresa Blizzard	Assistant Vice President - Tax
Wade Dahlman	Assistant Vice President - Tax
Brian V. Marler	Assistant Vice President - Tax
Gregory W. Nagrosst	Assistant Vice President - Tax
Fletcher Ricks	Assistant Vice President - Tax
Steven Shashack	Assistant Vice President - Tax
Gary Voelkel	Assistant Vice President - Tax
Terry Britt	Assistant Secretary - Tax
Karen M. Diorio	Assistant Secretary - Tax
Frank J. Maxwell	Assistant Secretary - Tax
Vivian Swierc	Assistant Secretary - Tax
Elaine Lou	Assistant Treasurer
Andrew B. Keiser	Assistant Treasurer
Sherri L. Bazan	Assistant Treasurer
Stacy W. Roth	Assistant Treasurer
Paul M. Wilson	Assistant Secretary
Jason Bunch	Executive Director - Payroll
Deirdre Scott	Director - Payroll

Each officer is a U.S. citizen and can be contacted at the following address: DIRECTV Enterprises, LLC, 2260 E. Imperial Highway, El Segundo, CA 90245.