

Approved by OMB
3060-0678

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Call sign: 52369

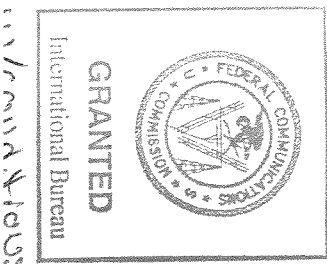
DTN-1R

FEDERAL COMMUNICATIONS COMMISSION
APPLICATION FOR SPACE STATION SPECIAL TEMPORARY AUTHORITY
FOR OFFICIAL USE ONLY

APPLICANT INFORMATION

Enter a description of this application to identify it on the main menu:
DIRECTV DIR STA Request to change orbital location

1. Applicant			
Name:	DIRECTV Enterprises, LLC	Phone Number:	310-726-4993
DBA Name:		Fax Number:	310-535-5323
Street:	2230 E. Imperial Hwy	E-Mail:	dapatillo@directv.com
City:	El Segundo	State:	CA
Country:	USA	Zipcode:	90245
Attention:	Dave Pattillo		

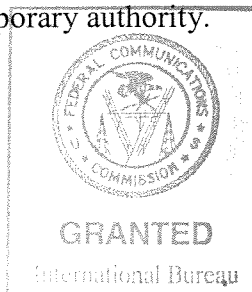


File # SAT-STA-20061213-0014
Call Sign S2369 Grant Date 3/8/07
(or other identifier)
From S2369 Term Dates To: + 180 days
Approved: [Signature]
Policy Branch Chief

Conditions of Authorization
File No. SAT-STA-20061213-00149
March 8, 2007

DIRECTV Enterprises, LLC's (DIRECTV) request for special temporary authority, IBFS File No. SAT-STA-20061213-00149, IS GRANTED. Accordingly, DIRECTV is authorized to conduct telemetry, tracking, and control communications related to the relocation of the DIRECTV 1R satellite from the 100.8° W.L. orbital location to the 72.5°W.L. orbital location in accordance with the terms, conditions, and technical specifications set forth in the Commission's rules and this document.

- 1) This authorization is for 180 days commencing on the date of grant.
- 2) During the drift of the DIRECTV 1R satellite to the 72.5° W.L. orbital location, DIRECTV shall not operate the main communications payload of the satellite.
- 3) DIRECTV shall coordinate all drift orbit telemetry, tracking, and control operations with other potentially affected in-orbit operators.
- 4) During the relocation of the DIRECTV 1R satellite, operations must be on a non-harmful interference basis, that is, DIRECTV shall not cause interference to, and shall not claim protection from, interference caused by any other lawfully operating satellites or radio communications systems.
- 5) In the event that any harmful interference is caused as a result of operations during the relocation of the DIRECTV 1R satellite, DIRECTV shall cease operations immediately upon notification of such an event, and shall inform the Commission immediately, in writing, of the event.
- 6) Effective upon the date that the DIRECTV 1R satellite reaches the 72.5° W.L. orbital location, the U.S. license for that satellite, Call Sign: S2369, is terminated. DIRECTV shall notify the Commission, by letter to the Chief, Satellite Division, International Bureau, within five business days following the date on which the DIRECTV 1R satellite reaches the 72.5° W.L. orbital location.
- 7) The Commission has exchanged letters with the Canadian Department of Industry to ensure a mutual understanding regarding the operations of the DIRECTV 1R satellite. The understandings and factual basis for these understandings are attached in Annex A and are material considerations for the grant of this special temporary authority.



w/conditions

File # SAT-STA-20061213-00149

Call Sign S2369 Grant Date 3/8/07
(or other identifier)

Term Dates
From 3/8/07 To: + 180 days

Approved: *Annika J. [Signature]*
Policy Branch Chief

ANNEX A

File No. SAT-STA-20061213-00149

March 8, 2007



Federal Communications Commission
Washington, DC 20554

International Bureau

March 8, 2007

Ms. Chantal Beaumier
Director, Space and International Regulatory Activities
Radiocommunications and Broadcasting Regulatory Branch
Industry Canada
15th Floor, 300 Slater Street
Ottawa, Ontario, Canada
K1A 0C8

Re: Operations of the DIRECTV 1R and DIRECTV 1 Space Stations

Dear Ms. Beaumier:

This letter is to confirm the informal understandings of the Canadian Department of Industry (Industry Canada) and the Federal Communications Commission (FCC) concerning certain technical issues involving the operation of two Broadcasting Satellite Service (BSS) satellites, DIRECTV 1R and DIRECTV 1, by DIRECTV Enterprises, LLC (DIRECTV) and Telesat Canada (Telesat). DIRECTV and Telesat have entered into an amended memorandum of agreement, and a satellite relocation and lease agreement. These agreements concern, in part, the technical issues discussed in prior correspondence, dated June 21 and 24, 2005, between the FCC and Industry Canada.

The Transaction between DIRECTV and Telesat

DIRECTV currently operates the DIRECTV 1R satellite at the 100.85° W.L. orbital location, subject to FCC authority. The DIRECTV 1 satellite is currently located at the 72.5° W.L. orbital location, where Telesat operates it pursuant to an authorization from Industry Canada.

DIRECTV has agreed to relocate the DIRECTV 1R satellite to the 72.5° W.L. orbital location, and, after completing that move and handing off customer traffic at that location, to make available the capacity on the DIRECTV 1 satellite for use by Telesat at either the 82° W.L. or 91° W.L. orbital location. Telesat has agreed to provide DIRECTV with an exclusive right to use all of the capacity on the DIRECTV 1R satellite at the 72.5° W.L. orbital location until December 31, 2009. Additionally, upon the exercise of certain options outlined in the amended agreement and subject to approval by the Canadian and U.S. governments, operations of DIRECTV 1R at the 72.5° W.L. orbital location under

Canadian authorization may be extended beyond the December 31, 2009 service termination date on a month-to-month basis. The amended agreement further provides that, once the DIRECTV 1R satellite has arrived at the 72.5° W.L. orbital location, the DIRECTV 1 satellite will be moved first to the 72.7° W.L. orbital location to transfer traffic to DIRECTV 1R, and then drifted to the 82° W.L. or 91° W.L. orbital location to augment service from Telesat's other satellites. Under the relocation and lease agreement between DIRECTV and Telesat, DIRECTV 1 will be relocated to the 91° W.L. orbital location for a lease terminating on March 1, 2009, but the termination date may be extended on a month-by-month basis until the end of life of the satellite. DIRECTV may, under certain circumstances, recall the DIRECTV 1 satellite from the 91° W.L. orbital location to one of DIRECTV's FCC-licensed orbital locations upon 5 days' notice to Telesat, in the event that DIRECTV 1 is needed to replace some or all of the capacity of certain DIRECTV satellites due to a catastrophic satellite or launch failure.

The agreement contemplates that, once DIRECTV 1R is at the 72.5° W.L. orbital location, it will be operated under the direction and control of Telesat. DIRECTV and its subcontractors will perform telemetry, tracking, and control functions (TT&C functions) on behalf of Telesat. The agreement also contemplates that, pursuant to an existing operations agreement between DIRECTV and Telesat, Telesat shall continue to provide TT&C functions for DIRECTV 1 until it is no longer used for service at the 82° W.L. or 91° W.L. orbital locations.

On January 18, 2007, Industry Canada authorized Telesat to operate the DIRECTV 1R satellite at the 72.5° W.L. orbital location, and to operate the DIRECTV 1 satellite at the 82° W.L. or 91° W.L. orbital location. DIRECTV filed with the FCC a request for special temporary authority to relocate the DIRECTV 1R satellite from its currently authorized location to the 72.5° W.L. orbital location. DIRECTV also filed a request to modify its blanket earth station authorization to substitute DIRECTV 1R for DIRECTV 1 as the point of communication for consumer earth stations in the United States, and to extend the term of that authority to December 31, 2009. DIRECTV also requested special temporary authority for TT&C frequencies to be used by the DIRECTV 1 space station as it is relocated from the 72.7° W.L. orbital location to the 91° W.L. orbital location. This last application also contemplates the concurrent operation of both the DIRECTV 1R and DIRECTV 1 satellites at the 72.5° W.L. and 72.7° W.L. orbital locations, respectively, for a short time to accommodate satellite testing and transfer of traffic from DIRECTV 1 to DIRECTV 1R.

Informal Understandings between Industry Canada and the FCC on certain technical issues concerning operation of DIRECTV 1R and DIRECTV 1:

The FCC and Industry Canada have concurred on the following technical issues concerning the contemplated operations of DIRECTV 1R and DIRECTV 1:

1. At the 72.5° W.L. orbital location, DIRECTV 1R operations will be subject to Canadian authority. At the 72.7° W.L., 82° W.L. and 91° W.L. orbital locations,

DIRECTV 1 operations will be subject to Canadian authority. Because these locations involve Canadian entries to the Region 2 Plan of Appendix 30/30A of the International Telecommunication Union (ITU) Radio Regulations, the Canadian administration will have responsibility for compliance with the ITU Radio Regulations (including the requirement for licensing as specified in Article 18.1 of the Radio Regulations, and any applicable agreement-seeking procedures) in connection with operation of the DIRECT 1R satellite at the 72.5° W.L. orbital location, and the DIRECTV 1 satellite at the 72.7° W.L., 82° W.L. and 91° W.L. orbital locations.

2. The following operations of the DIRECTV 1R satellite will be subject to licensing by the FCC:
 - a. Any operations of the satellite other than at the 72.5° W.L. orbital location.
 - b. Any operations as a result of equipment failure in the satellite that results in the inability to maintain the satellite within ± 0.1 degrees of its assigned position at the 72.5° W.L. orbital location.
3. The following operations of the DIRECTV 1 satellite will be subject to licensing by the FCC:
 - a. Any operations of the satellite other than i) operations during transfer of traffic at the 72.7° W.L. orbital location, ii) at the 82° W.L. orbital location, iii) at the 91° W.L. orbital location, or iv) while it is moving between the 82° W.L. and 91° W.L. orbital locations.
 - a. Any operations as a result of equipment failure in the satellite that results in the inability to maintain the satellite within ± 0.1 degrees of its assigned position at the 72.7° W.L., 82° W.L. or 91° W.L. orbital location.
 - c. Any operations after the termination of the lease agreement.
4. Industry Canada, through the Director, Space and International Regulatory Activities, once the Canadian licensee has been informed, will provide the FCC with four (4) days' advance written notice (e-mail with confirmed receipt from the FCC's Chief, International Bureau, Satellite Division, will be considered sufficient) of any planned termination or expiration of the Canadian License for the DIRECTV 1 or DIRECTV 1R satellites.
5. Industry Canada will condition the DIRECTV 1R and DIRECTV 1 Licenses to require Telesat to maintain, barring catastrophic failure of satellite components, the capability to de-orbit the DIRECTV 1R and DIRECTV 1 spacecraft to an orbit consistent with ITU Recommendation S.1003-1, Environmental Protection of the Geostationary-Satellite Orbit.

The informal understandings set forth in this letter concerning operation of the DIRECTV 1R and DIRECTV 1 satellites do not constitute a concurrence by the FCC or the United States Administration with any Canadian filings with the ITU Radiocommunication Bureau at the 72.5° W.L., 82° W.L., or 91° W.L. orbital locations under Appendices 30 or 30A of the ITU Radio Regulations. It is my understanding that the FCC and Industry Canada will, separately, and as part of the agreement-seeking process applicable under the ITU Radio Regulations, work in good faith to complete that process, insofar as necessary, in connection with the operation of the DIRECTV 1R satellite at the 72.5° W.L. orbital location and the operation of the DIRECTV 1 satellite at the 82° W.L. or 91° W.L. orbital location.

The FCC has not issued any of the authorizations that would be necessary to provide direct-to-home services to customers in the United States using the DIRECTV 1R satellite at the 72.5° W.L. orbital location. The FCC has received both an application for special temporary authority to relocate the DIRECTV 1R satellite to the 72.5° W.L. orbital location, and an application for amendment of DIRECTV's blanket authorization of earth stations seeking to receive direct-to-home transmissions in the United States from the 72.5° W.L. orbital location. The FCC has also received an application for special temporary authority to relocate the DIRECTV 1 satellite from 72.7° W.L. to 91° W.L. These applications will require separate action by the FCC. This exchange of letters does not constitute approval of any of these applications.

In the event of the failure of a DIRECTV satellite, and upon the exercise by DIRECTV of any contractual rights to move the DIRECTV 1 or DIRECTV 1R satellites, and in the event that there are any provisions in Telesat's license from Industry Canada, or any provisions in the Canadian laws and regulations governing the telecommunications operations of Telesat Canada that would preclude or otherwise limit the exercise of DIRECTV's contractual rights within the time frames specified in the DIRECTV/Telesat agreement, the FCC would appreciate the opportunity to consult with Industry Canada, prior to any exercise of such licensing authority, or applications of such law or regulations by Industry Canada. I would appreciate acknowledgment of these views and expression of any views which Industry Canada may have concerning the matter discussed in this paragraph. Let me also express the FCC's willingness to discuss this matter further, in the event, at a later date, it becomes necessary to do so.

Lastly, all notices, inquiries, and correspondence from Industry Canada concerning these matters should be directed to the Chief, Satellite Division, International Bureau (phone number 202-418-0719) (e-mail: Robert.Nelson@fcc.gov, with a copy to Karl.Kensinger@fcc.gov), on the part of the FCC. The FCC will forward all notices, inquiries, and correspondence concerning these matters to the Director, Space and International Regulatory Activities (phone number 613-998-3819) (e-mail: beaumier.chantal@ic.gc.ca), on the part of Industry Canada. Please let us know if this address subsequently changes.

Chantal Beaumier
March 8, 2007
Page 5

If the foregoing corresponds to your understanding of the informal arrangements between our two agencies concerning the various technical issues involved in the relocation of DIRECTV 1R to the 72.5° W.L. orbital location and operation at that location, and the relocation of DIRECTV 1 to the 91° W.L. orbital location, please confirm by return letter. Thank you.

Sincerely,



Robert G. Nelson
Chief
Satellite Division

cc: Paul Bush
Vice President, Broadcasting & Corporate Development
Telesat Canada

Michael W. Palkovic
Executive Vice President and Chief Financial Officer
DIRECTV Enterprises, LLC



Our File: 05943-1 (110214 RH)

MAR 08 2007

Robert G. Nelson
Chief, Satellite Division
International Bureau
Federal Communications Commission
Washington, D.C. 20554

Dear Mr. Nelson:

Thank you for your letter of March 08, 2007 setting out our informal common understandings concerning certain technical issues involved in the operation of Broadcasting-Satellite Service (BSS) satellites known by Telesat Canada (Telesat) and DIRECTV Enterprises, LLC (DIRECTV) as DIRECTV 1 and DIRECTV 1R.

I am pleased to provide my confirmation of our informal understandings and acknowledgement of the other views expressed in your letter. Additionally, Industry Canada acknowledges that, in the event of termination of the lease agreement owing to the failure of a DIRECTV satellite, DIRECTV's ability to use the DIRECTV 1 and DIRECTV 1R satellites at orbital positions licensed by the FCC is a private contractual matter between DIRECTV and Telesat. Nonetheless, should there be any provisions in Telesat's licence, or any provisions in the Canadian laws and regulations governing the telecommunications of Telesat Canada, that would preclude or otherwise limit the exercise of DIRECTV's contractual rights to terminate the lease and use the satellites within the time frames specified in the DIRECTV/Telesat agreement, the FCC would be informed, to the extent possible under the circumstances and the law, of the exercise of licensing authority, or application of law or regulation by Industry Canada.

...2

- 2 -

Once again, I want to express my appreciation for the support your administration is giving to this kind of commercial arrangement to facilitate the delivery of important and valuable satellite services in our respective countries.

Sincerely,

A handwritten signature in black ink, appearing to read "C. Beaumier". The signature is fluid and cursive, with a large initial "C" and a long, sweeping underline.

Chantal Beaumier
Director, Space and International
Regulatory Activities

cc: Paul Bush, Telesat Canada

2. Contact			
Name:	William M. Wiltshire	Phone Number:	202-730-1350
Company:	Harris, Wiltshire & Grannis, LLP	Fax Number:	202-730-1301
Street:	1200 18th Street, NW 12th Floor	E-Mail:	wwiltshire@harriswiltshire.com
City:	Washington	State:	DC
Country:	USA	Zipcode:	20036 -
Attention:		Relationship:	Legal Counsel
(If your application is related to an application filed with the Commission, enter either the file number or the IB Submission ID of the related application. Please enter only one.)			
3. Reference File Number or Submission ID			
4a. Is a fee submitted with this application?			
<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).			
<input type="radio"/> Governmental Entity <input type="radio"/> Noncommercial educational licensee			
<input type="radio"/> Other (please explain):			
4b. Fee Classification CRY - Space Station (Geostationary)			
5. Type Request			
<input checked="" type="radio"/> Change Station Location <input type="radio"/> Extend Expiration Date <input type="radio"/> Other			
6. Temporary Orbit Location 72.5 W.L.			7. Requested Extended Expiration Date

8. Description (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 requests special temporary authority to relocate DIRECTV 1R to the Canadian BSS slot at 72.5 W.L.

9. 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

10. Name of Person Signing
James Butterworth

11. Title of Person Signing
Senior Vice President

12. Please supply any need attachments.

Attachment 1: Request Narrative

Attachment 2:

Attachment 3:

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 jboley@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, D.C. 20554**

)	
<i>In the Matter of</i>)	
)	
DIRECTV ENTERPRISES, LLC)	File No. _____
)	
Request for Special Temporary Authority to)	
Relocate DIRECTV 1R to 72.5° W.L. and to)	
Conduct Telemetry, Tracking and Command)	
Operations for an Interim Period)	
)	

REQUEST FOR SPECIAL TEMPORARY AUTHORITY

DIRECTV Enterprises, LLC (“DIRECTV”) requests special temporary authority (“STA”) to (1) drift its DIRECTV 1R satellite from its current orbital position at 100.85° W.L. to the Broadcasting Satellite Service (“BSS”) slot allocated to Canada at 72.5° W.L., and (2) perform telemetry, tracking and command (“TT&C”) functions with DIRECTV 1R during this drift and for a period of time once it reaches its new location.¹ DIRECTV requests that the STA be granted for the statutory maximum of 180 days. Grant of this STA will both improve service to DIRECTV customers from the 72.5° W.L. orbital location and help Telesat Canada (“Telesat”) maintain much-needed backup capacity to ensure continued service to over a million Canadian customers.

* * *

¹ DIRECTV will soon begin the process of transferring traffic from the DIRECTV 1R satellite to its new DIRECTV 9S satellite at the nominal 101° W.L. orbital location. *See* File No. SAT-STA-2006080700085 *et al.* (DIRECTV 9S orbital testing). DIRECTV will complete the transfer of traffic prior to beginning relocation of DIRECTV 1, ensuring that no subscriber would experienced a lapse in service due to the satellite’s departure.

This is the third request DIRECTV has submitted to the Commission in connection with its use of the 72.5° W.L. orbital location. In 2004, the Commission granted DIRECTV an STA to relocate DIRECTV 5, pursuant to a December 2003 Memorandum of Agreement (“Original MOA”) with Telesat to use the Canadian BSS slot at 72.5° W.L.² The Commission found that the public interest would be served by the use of this additional capacity to provide local-into-local service to markets in the United States where DIRECTV did not then provide such service.³ One year later, the Commission granted DIRECTV a similar STA to replace the DIRECTV 5 satellite at 72.5° W.L. with the DIRECTV 1 satellite, which previously had been located at the nominal 101° W.L. orbital location, pursuant to an Amended and Restated Memorandum of Agreement (“Amended MOA”).⁴

DIRECTV has been operating from the 72.5° W.L. orbital location since September 2004, and currently retransmits local broadcast signals into 29 U.S. markets under this arrangement, enabling it to provide subscribers in those markets a more complete video services offering.

Last month, Telesat approached DIRECTV concerning the fact that the DIRECTV 2 satellite currently operating at the 91° W.L. orbital location would reach End of Life (“EOL”) by end of first quarter 2007, and that its Nimiq 2 satellite at 82° W.L. was continuing to experience power degradations that limited capacity and caused concern that there could be future failures. DIRECTV 2 was relocated to 91° W.L.

² See *DIRECTV Enterprises, LLC*, 19 FCC Rcd. 15529 (Int’l Bur. 2004).

³ *Id.* at 15532.

⁴ See *DIRECTV Enterprises, LLC*, 20 FCC Rcd 11772 (Int’l Bur. 2005), *modified by Erratum* 2005 FCC LEXIS 4181 (2005) (“*DI STA Order*”). The DIRECTV 5 satellite was relocated to the 110° W.L. orbital location, where it, in turn, replaced the ailing DIRECTV 6 satellite.

earlier this year and is currently enabling high power operations at this orbital location but needs to be replaced prior to EOL for continued high power operations.

Nimiq 2 was launched in December 2002, and experienced a malfunction in February 2003 that affected the available power on the spacecraft. As a result of this anomaly, the south solar array does not function. More recently, in September 2006, Nimiq 2 experienced a failure of a solar array circuit, resulting in a further reduction of available power.

At present, Nimiq 2 can operate on 20 of its 32 DBS transponders, and Telesat expects that it will lose operational capability on three more transponders by the end of the spacecraft's service life due to normal array degradation. However, a number of Lockheed Martin A2100 series satellites (such as Nimiq 2) have suffered in-orbit failures of circuits on their solar array. In April 2005, another operator's satellite of this series suffered such an anomaly, resulting in the complete loss of one array and a corresponding 50% reduction in available spacecraft power. Lockheed Martin has traced the most likely cause of this failure to a component on the solar array drive – a component that was also used for Nimiq 2. If this same component failed on the satellite's lone remaining functional array, the result would be catastrophic failure.

Telesat plans to launch a new satellite (Nimiq 4) to replace Nimiq 2 in mid-2008. While it anticipates that Nimiq 2 will remain operational until that time, Telesat seeks additional backup capacity to assure continuity of service to Bell ExpressVu customers. As indicated below, DIRECTV and Telesat have reached an agreement concerning the use of DIRECTV 1 until the Nimiq 4 satellite is brought into service. This arrangement

will fill the gap between the loss of DIRECTV 2 and the availability of Nimiq 4 for service.

DIRECTV, for its part, recently launched its new DIRECTV 9S satellite to the nominal 101° W.L. orbital location. DIRECTV 9S has been designed to provide back-up capacity for a wide range of DIRECTV satellites, and can perform the same mission that DIRECTV 1R currently performs.

As of November 22, 2006, DIRECTV and Telesat entered into Amendment No. 1 to the Amended and Restated Memorandum of Agreement (“Amendment No. 1”) that, among other things, calls for DIRECTV to replace the DIRECTV 1 satellite at 72.5° W.L. with the DIRECTV 1R satellite, subject to receiving the requisite regulatory authorizations from both the U.S. and Canadian regulatory authorities.⁵ Upon relocation of the DIRECTV 1R satellite to 72.5° W.L. and transfer of traffic, the DIRECTV 1 satellite would be drifted to the 91° W.L. orbital location to provide high power operations and backup capacity to the Nimiq satellites.⁶

Amendment No. 1 presumptively extends DIRECTV’s rights to operate at 72.5° W.L. through December 31, 2009. This will allow DIRECTV much-needed flexibility in transitioning customers that now receive local service from that orbital location (and require a second receive antenna to do so) to service from DIRECTV’s Ka-band satellites at 99.2° W.L. and 102.8° W.L. This flexibility will enable DIRECTV to complete the Ka-band transition with less disruption to subscribers and at lower cost. At the same

⁵ See Amendment No. 1 at 3. A redacted copy of this agreement will be provided for the public record shortly, while the complete text will be filed with the International Bureau staff with a request for confidential treatment pursuant to Sections 0.457 and 0.459 of the Commission’s rules.

⁶ DIRECTV will file a separate request for clearance to allow Telesat, under authority from Industry Canada, to relocate DIRECTV 1 from one Canadian-allocated orbital location to another.

time, relocating the DIRECTV 1 satellite to 91° W.L. will, essentially, act as an insurance policy for the Nimiq satellite fleet, which now provides service to approximately 1.8 million Bell ExpressVu subscribers.

As it did in replacing the DIRECTV 5 satellite with the DIRECTV 1 satellite last year, DIRECTV will ensure that this satellite swap is completely transparent to its subscribers. Accordingly, once DIRECTV 1R arrives at 72.5° W.L. and all necessary regulatory approvals have been secured, DIRECTV will expeditiously transfer traffic from DIRECTV 1 in a manner designed to minimize the possibility of service outages. DIRECTV 1R has over seven years of useful life remaining and is fully capable of continuing to provide local-into-local service in the markets currently served by DIRECTV 1 without interruption to subscribers. Thus, granting the requested STA for DIRECTV 1R will achieve the same public interest goals that the Commission has now twice found in connection with the operations of DIRECTV 5 and DIRECTV 1 at the Canadian BSS orbital location at 72.5° W.L.

During the relocation of DIRECTV 1R, and until the Commission grants further authority, the satellite's communications payload will remain inactive and only the TT&C payload will operate. Specifically, DIRECTV requests authority to operate on the following TT&C frequencies: 17305 (uplink) and 12698.25 and 12699.25 MHz (downlink).⁷ DIRECTV will coordinate its TT&C operations during drift with all other potentially affected operators in accordance with industry practice to ensure that no harmful interference results, just as it did for DIRECTV 5 and DIRECTV 1, and is prepared to operate on a non-harmful interference basis.


⁷ Since TT&C for DIRECTV 1 is conducted using different frequencies (17303 MHz (uplink) and 12200.5 and 12201.75 MHz (downlink)), there is no risk of interference during its brief period of collocation with DIRECTV 1R at the 72.5° W.L. position.

Under the terms of Amendment No. 1, DIRECTV will have continuing responsibility for TT&C functions of DIRECTV 1R on a day-to-day basis once it has been re-flagged as a Canadian satellite, subject to Telesat's ultimate right to direct such functions. As is now the case with DIRECTV 1, the DIRECTV 1R satellite at 72.5° W.L. will operate under authorization from Industry Canada and in conformance with the parameters of ITU regulations and coordination obligations. Again, subject to obtaining the necessary Commission consent, DIRECTV will utilize the capacity on DIRECTV 1R to provide U.S. DBS service to its U.S. DBS customers, just as it currently does from DIRECTV 1.

DIRECTV proposes to operate DIRECTV 1R at 72.5° W.L. under the same conditions imposed on the authorization issued for DIRECTV 1 at that slot.⁸ Thus, little will change from the current situation except that one DIRECTV DBS satellite will take the place of another.

For the foregoing reasons, DIRECTV urges the Commission to grant the requested STA as expeditiously as possible.

Respectfully submitted,



James R. Butterworth
Senior Vice President
DIRECTV Enterprises, LLC

December 13, 2006

⁸ See *D1 STA Order*, 20 FCC at 11778-79.