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Federal Communications Commission
Bureau / Office

BY HAND DELIVERY

Andrea Kelly
Chief, Policy Branch
Satellite Division
International Bureau
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

Re: *FCC File No. SAT-STA-20070409-00060*

Dear Ms. Kelly:

In the above referenced proceeding, DIRECTV Enterprises, LLC (“DIRECTV”) has requested Special Temporary Authority (“STA”) to de-orbit the DIRECTV 2 satellite from the nominal 91° W.L. orbital location. After discussing the methodology for calculating the value for C_R used in the guideline formula established by the Inter-Agency Space Debris Coordination Committee (“IADC”), DIRECTV has concluded that a value of 1.2 would be more appropriate for purposes of this application. Accordingly, the IADC equation for DIRECTV 2 as revised yields the following results:

$$36,021 \text{ km} + (1000 * 1.2 * (63.9 / 1251)) = 36,082.294 \text{ km}$$

Since geostationary altitude is generally considered to be 35,786 km, this yields a desired disposal orbit of at least 296.3 km above the geostationary arc. As stated in its application, DIRECTV intends to boost DIRECTV 2 to a target height of approximately 300 km above geostationary altitude, which should be more than sufficient to satisfy this guideline.¹

¹ In addition, the figure used for the surface area of the satellite is a worst-case value, based on an unrealistically conservative assumption that the solar panels and reflectors will always be facing directly toward the sun.

HARRIS, WILTSHIRE & GRANNIS LLP

Andrea Kelly
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If you have any questions, please do not hesitate to contact me.

Respectfully submitted,

A handwritten signature in cursive script that reads "William Wiltshire by mm".

William M. Wiltshire
Counsel to DIRECTV Enterprises, LLC

cc: Sankar Persuad