



December 1, 2009

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

Re: ***Request for Special Temporary Authority for In-Orbit Testing of
DIRECTV 12 at 76° W.L.***

Dear Ms. Dortch:

DIRECTV Enterprises, LLC (“DIRECTV”) hereby requests Special Temporary Authority (“STA”) to locate the DIRECTV 12 satellite (call sign S2797) at the 76° W.L. orbital location for in-orbit testing (“IOT”) after launch of the satellite, which is currently scheduled for late December 2009. This STA will cover a period of approximately 30 days within a 60 day window, which DIRECTV requests be keyed to become effective upon the satellite’s arrival at 76° W.L.

DIRECTV 12 is currently at the launch site being readied for launch later this month. DIRECTV desires to conduct IOT for approximately four weeks before moving the satellite to its licensed position to begin commercial operations. Specifically, DIRECTV contemplates the following schedule [with approximate dates indicated in brackets]:

- After launch and orbit raising maneuvers, DIRECTV 12 will be located at 76° W.L. [no earlier than about February 15, 2010].
- After DIRECTV 12 reaches 76° W.L., DIRECTV will then commence IOT of the satellite for approximately 4 weeks.¹
- After IOT is completed, DIRECTV 12 will then be drifted to its assigned location over the course of approximately 20 days [reaching that orbital position no later than about May 5, 2010].

¹ During the period covered by this STA, DIRECTV will use 29255.00 and 29497.00 MHz for its command uplinks and 18302.25 and 18302.75 MHz for its telemetry downlinks.

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In order to address the timing uncertainties normally associated with positioning a spacecraft after launch, DIRECTV requests that the STA become effective upon the arrival of DIRECTV 12 at 76° W.L.

Operation and testing of DIRECTV 12 during IOT will consist of performance verification testing of all transponders and antenna pattern verification testing of all antenna beams. During this testing, unmodulated CW carriers will be used to generate swept frequency response and gain transfer characteristics of each transponder. The maximum value of transmit power used during this testing will be consistent with the DIRECTV 12 application,² except for short periods of time during gain transfer when the maximum transmit power could exceed that value by up to 7 dB.³ This testing will not result in harmful interference to other satellite systems as the closest co-frequency operational satellite is located 9° away. DIRECTV will also coordinate its TT&C operations with all other potentially affected operators to ensure that no harmful interference results. Furthermore, DIRECTV is prepared to terminate all testing operations immediately upon notification from the Commission that its operations cause harmful interference to any authorized user of the spectrum.

Grant of this STA request will serve the public interest by allowing DIRECTV to test the DIRECTV 12 satellite to ensure that it is fully operational and ready to begin providing service to millions of DIRECTV subscribers from the satellite's licensed orbital location. Allowing DIRECTV to test the satellite at 76° W.L. will serve the public interest by minimizing the risk of interference. Accordingly, and in light of the impending launch date, DIRECTV requests the expeditious grant of special temporary authority.

Respectfully submitted,



William M. Wiltshire
Counsel to DIRECTV Enterprises, LLC

² See IBFS File No. SAT-LOA-20090807-00086.

³ Note that, as with IOT testing of DIRECTV 10 and 11, all of DIRECTV 12 IOT testing will be closely coordinated with U.S. government systems under FN US334.