



December 2, 2009

BY ELECTRONIC FILING

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 RB-2A at 76° W.L.***

Dear Ms. Dortch:

DIRECTV Enterprises, LLC (“DIRECTV”) hereby requests Special Temporary Authority (“STA”) to conduct in-orbit testing of DIRECTV RB-2A (call sign S2796) at the 76° W.L. orbital location. As described in the underlying application,¹ DIRECTV RB-2A is a 17/24 GHz BSS payload that is part of the DIRECTV 12 satellite. As such, DIRECTV desires to conduct in-orbit testing (“IOT”) of this payload while DIRECTV 12 is located at 76° W.L. for its Ka-band payload IOT. DIRECTV 12 is currently scheduled for launch in late December 2009. This STA will cover a period of approximately 30 days, which DIRECTV requests be keyed to become effective upon DIRECTV 12’s arrival at 76° W.L.

DIRECTV 12, with the DIRECTV RB-2A payload, 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 (with the DIRECTV RB-2A payload) will be located at 76° W.L. [no earlier than about February 15, 2010].

¹ See IBFS File No. SAT-LOA-20090807-00085.

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- After the satellite reaches 76° W.L., DIRECTV will then integrate IOT of the DIRECTV RB-2A payload with that of the DIRECTV 12 Ka-band payload during the approximately 4 weeks that the satellite will remain at this location.
- After all 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].

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 RB-2A during IOT will consist of performance verification testing of the transponders and antenna pattern verification testing. During this testing, unmodulated CW carriers will be used to generate swept frequency response and gain transfer characteristics of the tested transponders. The maximum value of transmit power used during this testing will be consistent with the DIRECTV RB-2A application, except for short periods of time during gain transfer when the maximum transmit power could exceed that value by up to 12 dB. This testing will not result in harmful interference to other satellite systems as there are no other co-frequency satellites operating in this frequency band. 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 RB-2A payload 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