Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

Application of	)	
INTELSAT LICENSE LLC	)	File No. SAT-MOD-20120619-00100
	)	SAT-AMD-20120815-00131
Application to Modify Authorization For Intelsat 8 (S2460)	)	

COMMENTS OF DIRECTV ENTERPRISES, LLC

DIRECTV Enterprises, LLC ("DIRECTV") hereby comments on the application filed by Intelsat License LLC ("Intelsat") to modify the authorization for the Intelsat 8 satellite. Among other things, the requested modification would allow Intelsat to relocate the satellite to 169º E.L. and operate on frequencies allocated to the Broadcasting Satellite Service ("BSS") in ITU Region 2 to provide Fixed Satellite Service ("FSS") to any earth station in ITU Region 2 that can receive its signal. As discussed below, DIRECTV does not object to the particular proposal in this proceeding, but is concerned about the potential scope of the precedent it could set.

At present, Intelsat operates the Intelsat 8 satellite at 166º E.L., where it has been granted a waiver to provide commercial FSS using the BSS transmission frequencies (12250-12700 MHz) on a non-interference, non-protected basis in communication with a single earth station facility in Napa, California. In this application, Intelsat seeks authority to broaden that waiver to encompass any earth station in ITU Region 2. As Intelsat points out, its proposed operations would have a large orbital separation from any

other satellite providing DBS service in Region 2 (*e.g.*, DIRECTV's nearest satellite at 119º W.L. is over 70º away), and its beam barely reaches the continental United States. In these circumstances, DIRECTV does not object to the limited waiver Intelsat seeks.

However, DIRECTV is concerned with the potential precedent such a waiver could set if not explicitly limited from the outset. In any grant of this application, the Commission should make clear that this waiver is appropriate in the unique circumstances presented here, and is not an invitation for future waiver requests that could impinge upon BSS operations in ITU Region 2.

Respectfully submitted,

DIRECTV ENTERPRISES, LLC

By: /s/

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CERTIFICATE OF SERVICE

I hereby certify that, on this 20th day of August, 2012, a copy of the foregoing Comments was served by first class mail, postage prepaid, upon:

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