

S2930 SAT-STA-20180924-00075 IB2018006112
DIRECTV Enterprises, LLC
DTV T15



File # SAT-STA-20180924-00075

Call Sign S2930 Grant Date 10/04/18

(or other identifier)

From 10/04/18 Term Dates period of To: 30 days

Approved by OMB
3060-0678

Approved: *Stephen J. Duall*

Stephen J. Duall
Chief, Satellite Policy Branch

Date & Time Filed: Sep 24 2018 5:16:09:636PM
File Number: SAT-STA-20180924-00075
Callsign:

FEDERAL COMMUNICATIONS COMMISSION
APPLICATION FOR SPACE STATION SPECIAL TEMPORARY AUTHORITY
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APPLICANT INFORMATION

Enter a description of this application to identify it on the main menu:
30-Day STA Extension Request to Relocate T15 (Call Sign S2930) to 101 WL

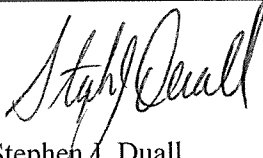
1. Applicant

Name:	DIRECTV Enterprises, LLC	Phone Number:	310-964-4996
DBA Name:		Fax Number:	
Street:	1120 20th Street, NW Suite 1000	E-Mail:	spdulac@att.com
City:	Washington	State:	DC
Country:	USA	Zipcode:	20036 -
Attention:	Steve Dulac		

ATTACHMENT TO GRANT
DIRECTV Enterprises, LLC
IBFS File No. SAT-STA-20180924-00075

IBFS File No(s):	SAT-STA-20180924-00075	<p>GRANTED – With Conditions</p>  <p>International Bureau Satellite Division</p>
Licensee/Grantee:	DIRECTV Enterprises, LLC (DIRECTV)	
Call Sign:	S2930	
Satellite Name:	DIRECTV T15	
Orbital Location: (required station-keeping tolerance)	100.85° W.L. (±0.05° East-West, ±0.05° North-South)	
Administration:	United States of America	
Nature of Service:	Direct Broadcast Satellite (DBS) Telemetry, tracking, & command (TT&C)	
Scope of Grant:	Special temporary authority for a period of 30 days to DIRECTV Enterprises, LLC to continue to conduct telemetry, tracking and command operations necessary to drift DIRECTV T15 from the 102.75° W.L. orbital location to the 100.85° W.L. orbital location and to maintain it at that position and to provide direct broadcast satellite service while at 100.85° W.L.	
Service Area(s):	N/A	
Frequencies:	12.2-12.7 GHz (space-to-Earth) 17.3-17.8 GHz (Earth-to-space) <u>Telemetry, Tracking, and Command</u> 29.5025 GHz (space-to-Earth) 29.5059 GHz (space-to-Earth) 20.1985 GHz (Earth-to-space) 20.1995 GHz (Earth-to-space)	
<p>Unless otherwise specified herein, operations under this grant must comport with the legal and technical specifications set forth by the applicant or petitioner and with Federal Communication Commission's rules not waived herein. This grant is also subject to the following conditions:</p> <ol style="list-style-type: none"> 1. Operations pursuant to this special authority must be on an unprotected and non-harmful interference basis, i.e. the DIRECTV T15 space station must not cause harmful interference to, and DIRECTV must not claim protection from interference caused to it by, any other lawfully operating station. In the event of any harmful interference, DIRECTV must cease operations immediately upon notification of such interference, and must inform the Commission, in writing, immediately of such an event. 2. DIRECTV must coordinate the operations of DIRECTV T15 with existing geostationary space stations to ensure that no unacceptable interference results from its operations. 3. Any action taken or expense incurred as a result of this special temporary authority is solely at DIRECTV's own risk. 		
<p>Licensee/grantee is afforded thirty (30) days from the date of release of this action to decline the grant as conditioned. Failure to respond within this period will constitute formal acceptance of the grant as conditioned.</p> <p>This action is taken pursuant to Section 0.261 of the Commission's rules on delegated authority, 47 CFR § 0.261, and is effective upon release.</p> <p>Station licenses are subject to the conditions specified in Section 309(h) of the Communications Act of 1934, as amended, 47 U.S.C. § 309(h).</p>		

ATTACHMENT TO GRANT
DIRECTV Enterprises, LLC
IBFS File No. SAT-STA-20180924-00075

Action Date:	October 4, 2018	
Term Dates	From: October 4, 2018	To: period of 30 days
Approved:	 Stephen J. Duall Chief, Satellite Policy Branch	

2. Contact

Name:	Jennifer D. Hindin	Phone Number:	202-719-4975
Company:	Wiley Rein LLP	Fax Number:	202-719-7049
Street:	1776 K Street, NW	E-Mail:	jhindin@wileyrein.com
City:	Washington	State:	DC
Country:	USA	Zipcode:	20006 -
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?

- If Yes, complete and attach FCC Form 159. If No, indicate reason for fee exemption (see 47 C.F.R. Section 1.1114).
- Governmental Entity Noncommercial educational licensee
- Other (please explain):

4b. Fee Classification CRY – Space Station (Geostationary)

5. Type Request

- Change Station Location Extend Expiration Date Other

6. Temporary Orbit Location

100.85 WL

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 respectfully requests an extension of its grant of special temporary authority for an additional 30 days commencing October 4, 2018 to operate its T15 satellite (Call Sign S2930) at the 100.85 W.L. orbital location.

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
Steve Dulac

11. Title of Person Signing
Director, Content Technology & Policy

12. Please supply any need attachments.

Attachment 1: 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).

EXHIBIT 1
REQUEST FOR SPECIAL TEMPORARY AUTHORITY

DIRECTV Enterprises, LLC (“DIRECTV”) respectfully requests an extension of its grant of special temporary authority (“STA”)¹ for an additional 30 days commencing October 4, 2018 to operate its T15 satellite (Call Sign S2930) at the 100.85° W.L. orbital location. Pursuant to Section 1.62 of the Commission’s rules, DIRECTV will continue to operate T15 at 100.85° W.L. pursuant to the terms and conditions of its existing STA pending action on this timely filed renewal request.²

T15 is permanently licensed to operate at 102.75° W.L.³ On August 28, 2018, the Commission granted DIRECTV’s 30-day STA request to drift T15 from 102.75° W.L. to 100.85° W.L. and to operate the satellite at 100.85° W.L.⁴ On August 30, 2018, DIRECTV filed a 180-day STA request to continue operating T15 at 100.85° W.L. until the satellite returns to its permanently licensed orbital location.⁵ As explained in those applications, DIRECTV is relocating T15 to 100.85° W.L. to fill a temporary business need for additional Ku-band DBS (12.2-12.7 GHz (space-to-Earth) and 17.3-17.8 GHz (Earth-to-space)) capacity at the nominal 101° W.L. orbital location. The drift began on September 5, 2018 and was completed on September 13, 2018. T15 will initially be collocated with DIRECTV’s T8 satellite (Call Sign

¹ DIRECTV has filed this STA request, an FCC Form 159, and a \$980.00 filing fee electronically via the International Bureau’s Filing System.

² See 47 C.F.R. § 1.62.

³ See *Policy Branch Information; Actions Taken*, Public Notice, Report No. SAT-01086, File No. SAT-LOA-20140825-00094 (May 22, 2015); *Policy Branch Information; Actions Taken*, Public Notice, Report No. SAT-01084, File No. SAT-MOD-20140612-00066 (May 15, 2015). T15’s 17/24 GHz BSS band payload was originally authorized under Call Sign S2712, which was consolidated with Call Sign S2930 in September 2017.

⁴ See *30-Day STA Request to Relocate T15 (Call Sign S2930) to 101 WL*, File No. SAT-STA-20180817-00063 (stamp grant Aug. 28, 2018).

⁵ See *Policy Branch Information; Space Station Applications Accepted for Filing*, Report No. SAT-01344, File No. SAT-STA-20180830-00064 (Sept. 14, 2018). DIRECTV currently anticipates returning T15 to the nominal 103° W.L. orbital location in 2019 based on business needs.

S2632) at 100.85° W.L.⁶ On September 21, 2018, DIRECTV filed a separate STA request to relocate T8 to 100.75° W.L. once traffic is transferred from T8 to T15.⁷ In accordance with these objectives, DIRECTV respectfully submits this STA request to continue operating T15 at 100.85° W.L. for an additional 30-day period beginning October 4, 2018 while DIRECTV's 180-day STA request for T15 remains pending before the Commission.

At 100.85° W.L., DIRECTV seeks authority to operate on the Ku-DBS communications frequencies (12.2-12.7 GHz (space-to-Earth) and 17.3-17.8 GHz (Earth-to-space)). At the nominal 101° W.L. orbital location, DIRECTV will provide DBS service using 12/17 GHz DBS frequency bands already assigned to DIRECTV for use at the location on DIRECTV's T8, T9S (Call Sign S2669), and T4S (Call Sign S2430) satellites. As such, this application for special temporary authority does not implicate the Commission's freeze on new DBS applications.⁸

While T15 is located at the nominal 101° W.L. orbital location, DIRECTV also seeks authority to provide telemetry, tracking, and control ("TT&C"). The specific TT&C frequencies are as follows:

- 29502.5 MHz and 29505.9 MHz (T); and
- 20198.5 MHz and 20199.5 MHz (R).

⁶ See *Policy Branch Information; Actions Taken*, Public Notice, Report No. SAT-01088, File No. SAT-MOD-20150304-00009 (May 29, 2015); *Policy Branch Information; Actions Taken*, Public Notice, Report No. SAT-00431, File Nos. SAT-AMD-20070111-00010, SAT-MOD-20061213-00151 (Mar. 30, 2007). T8's Ka-band payload was originally authorized under Call Sign S2132, which was consolidated with Call Sign S2632 in September 2017.

⁷ See *30-Day STA Request to Relocate T8 (Call Sign S2632)*, File No. SAT-STA-20180921-00074.

⁸ See *Direct Broadcast Satellite (DBS) Service Auction Nullified: Commission Sets Forth Refund Procedures for Auction No. 52 Winning Bidders and Adopts a Freeze on All New DBS Service Applications*, Public Notice, 20 FCC Rcd 20618 (2005) (clarifying that "[t]he freeze does not apply to applications for replacement satellites, modifications to existing satellite licenses, or requests for special temporary authority, unless such applications seek authority to operate on frequencies and/or orbital locations *not previously authorized for operation by that licensee*") (emphasis added).

Grant of this STA will not result in increased risk of harmful interference. DIRECTV will operate the communications payload at 100.85° W.L. in conformance with FCC rules and any relevant coordination agreements. DIRECTV has previously provided technical information for T15's Ku-DBS payload and incorporates such information by reference here.⁹

DIRECTV has assessed and limited the probability of the space station becoming a source of debris as a result of collisions with large debris or other operational space stations. Apart from the satellite's temporary collocation with DIRECTV's T8 satellite, which DIRECTV will manage internally to ensure safe-stationkeeping, T15 will not be located at the same orbital location as another satellite or at an orbital location that has an overlapping station-keeping volume with another satellite. DIRECTV is not aware of any other FCC-licensed system, or any other system applied for and under consideration by the FCC, having an overlapping station-keeping volume with T15 at 100.85° W.L. DIRECTV is also not aware of any other system with an overlapping station-keeping volume with T15 that is the subject of an ITU filing that is either in orbit or progressing towards launch.

Grant of this STA request will serve the public interest because it will extend coverage, improve service performance, and provide additional capacity to customers at the nominal 101° W.L. orbital location. Accordingly, DIRECTV respectfully requests that the Commission grant this request.

⁹ See *Application of DIRECTV Enterprises, LLC For Authorization to Launch and Operate DIRECTV 15 at 103° W.L.*, File No. SAT-LOA-20140825-00094 (granted May 20, 2015).