

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 180 days commencing May 3, 2019 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 November 1, 2018, the Commission granted DIRECTV’s 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 temporarily operating T15 at 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

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). The Commission extended this STA grant for an additional 30 days on October 4, 2018. See *30-Day STA Extension Request to Relocate T15 (Call Sign S2930) to 101 WL*, File No. SAT-STA-20180924-00075 (stamp grant Oct. 4, 2018).

⁵ See *180-Day STA Request to Operate T15 (Call Sign S2930) at 101 WL*, File No. SAT-STA-20180830-00064 (stamp grant Nov. 1, 2018).

September 5, 2018 and was completed on September 13, 2018. T15 was initially collocated with DIRECTV's T8 satellite (Call Sign S2632) at the 100.85° W.L. orbital location,⁶ though T8 has since been temporarily relocated to 100.75° W.L. pursuant to a separate grant of special temporary authority.⁷ As DIRECTV anticipates a continuing business need for additional Ku-band DBS capacity at the nominal 101° W.L. orbital location, DIRECTV respectfully submits this STA extension request to continue operating T15 at 100.85° W.L. for an additional 180-day period beginning May 3, 2019 until the satellite returns to its permanently licensed orbital location.⁸

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.⁹

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 *180-Day STA Request to Operate T8 (Call Sign S2632) at 100.75 WL*, File No. SAT-STA-20180928-00077 (stamp grant Nov. 28, 2018); see also *30-Day STA Extension Request to Relocate T8 (Call Sign S2632)*, File No. SAT-STA-20181018-00080 (stamp grant Nov. 1, 2018); *30-Day STA Request to Relocate T8 (Call Sign S2632)*, File No. SAT-STA-20180921-00074 (stamp grant Sept. 27, 2018). The drift of T8 from 100.85° W.L. to 100.75° W.L. began on October 3, 2018 and was completed on October 10, 2018.

⁸ DIRECTV currently anticipates returning T15 to the nominal 103° W.L. orbital location later in 2019 based on business needs.

⁹ 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).

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).

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.¹⁰

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. 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.

¹⁰ 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).