

S2930 SAT-STA-20190416-00028 IB2019001109
DIRECTV Enterprises, LLC
DIRECTV T15



File # SAT-STA-20190416-00028

Call Sign S2930 Grant Date 06/06/19

(or other identifier)

Term Dates period of 180 days

From 05/05/19 To: _____

Approved: Stephen J. Duall

Stephen J. Duall
Chief, Satellite Policy Branch

Approved by OMB
3060-0678

Date & Time Filed: Apr 16 2019 6:12:04:100PM
File Number: SAT-STA-20190416-00028
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:
180-Day STA Extension Request to Operate T15 (Call Sign S2930) at 101 WL


I. 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-20190416-00028

| | | |
|--|---|---|
| IBFS File No(s): | SAT-STA-20190416-00028 | <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 180 days to continue to provide DBS at 100.85° W.L. | |
| Previous Grant(s): | See IBFS File no. SAT-STA-20180830-00064 | |
| 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). Space station licenses are subject to conditions specified in Section 309(h) of the Communications Act of 1934, amended, 47 U.S.C. § 309(h).</p> | | |
| Action Date: | May 28, 2019 | |

ATTACHMENT TO GRANT
DIRECTV Enterprises, LLC
IBFS File No. SAT-STA-20190416-00028

| | | |
|---|--------------------------|-------------------------------|
| Term Dates | From: May 5, 2019 | To: period of 180 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 requests an extension of its grant of special temporary authority 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.

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 & Regulatory 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).

FCC NOTICE REQUIRED BY THE PAPERWORK REDUCTION ACT

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THE FOREGOING NOTICE IS REQUIRED BY THE PAPERWORK REDUCTION ACT OF 1995, PUBLIC LAW 104-13, OCTOBER 1, 1995, 44 U.S.C. SECTION 3507.

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).