

S2669 SAT-STA-20190703-00055  
DIRECTV Enterprises, LLC  
DirecTV T9S

IB2019002609



\*with conditions

File # SAT-STA-20190703-00055

Call Sign S2669 Grant Date 07/17/19

(or other identifier)

From 07/24/19 To: 60 days

Term Dates period of

Approved by OMB  
3060-0678

Approved: *Stephen J. Dull*

Stephen J. Dull  
Chief, Satellite Policy Branch

Date & Time Filed: Jul 3 2019 3:35:40:053PM  
File Number: SAT-STA-20190703-00055  
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:  
60-Day STA Request to Relocate T9S (Call Sign S2669)

I. Applicant

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

**ATTACHMENT TO GRANT**  
**DIRECTV Enterprises, LLC**  
**IBFS File No. SAT-STA-20190703-00055**

<b>IBFS File No(s):</b>	SAT-STA-20190703-00055	<p><b>GRANTED – With Conditions</b></p>  <p><b>International Bureau Satellite Division</b></p>
<b>Licensee/Grantee:</b>	DIRECTV Enterprises, LLC (DIRECTV)	
<b>Call Sign:</b>	S2669	
<b>Satellite Name:</b>	DIRECTV T9S	
<b>Orbital Location: (required station-keeping tolerance)</b>	101.2° W.L. (± 0.05 degrees east-west)	
<b>Administration:</b>	United States of America	
<b>Nature of Service:</b>	Telemetry, tracking, & command (TT&C) Direct Broadcast Satellite (DBS) Fixed-Satellite Service (FSS)	
<b>Scope of Grant:</b>	Special temporary authority for a period of 60 days to conduct TT&C operations necessary to drift DIRECTV T9S from the 101.1° W.L. orbital location to the 101.2° W.L. orbital location and to provide DBS and FSS at 101.2° W.L.	
<b>Service Area(s):</b>	<i>See</i> Schedule S Tech Report (Item S6(d)) and GXT files in IBFS File Nos. SAT-MOD-20060908-00101 and SAT-LOA-20051123-00250.	
<b>Frequencies:</b>	<p><u>DBS Frequencies:</u> 12.2-12.7 GHz (space-to-Earth) and 17.3-17.8 GHz (Earth-to-space)</p> <p><u>FSS Frequencies:</u> 18.8-18.8 GHz (space-to-Earth) 19.7-20.2 GHz (space-to-Earth) 28.35-28.6 GHz (Earth-to-space) 29.25-29.5 GHz (Earth-to-space) 29.5-30.0 GHz (Earth-to-space)</p> <p><u>Telemetry, Tracking, and Command:</u> 12.6955 GHz (space-to-Earth) 17.7950 GHz (Earth-to-space)</p>	
<p><b>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:</b></p> <ol style="list-style-type: none"> <li>1. Operations pursuant to this special authority must be on an unprotected and non-harmful interference basis, i.e. the DIRECTV T9S 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.</li> <li>2. DIRECTV must coordinate the operations of DIRECTV T9S with existing geostationary space stations to ensure that no unacceptable interference results from its operations during the drift to the 101.2° W.L. orbital location.</li> <li>3. DIRECTV may not provide payload services during the drift.</li> <li>4. Any action taken or expense incurred as a result of this special temporary authority is solely at DIRECTV's own risk. This grant is without prejudice to any action taken in IBFS File No. SAT-MOD-20190703-00054.</li> </ol>		
<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>		

**ATTACHMENT TO GRANT**  
**DIRECTV Enterprises, LLC**  
**IBFS File No. SAT-STA-20190703-00055**

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.

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).

<b>Action Date:</b>	July 17, 2019
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<b>Term Dates</b>	<b>From:</b> July 24, 2019	<b>To:</b> period of 60 days
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**Approved:**



Stephen J. Duall  
Chief, Satellite Policy Branch

2. Contact

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

101.2 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 a grant of special temporary authority for 60 days commencing July 24, 2019 to drift its T9S satellite (Call Sign S2669) from its current location at 101.1 W.L. to 101.2 W.L. and to operate the satellite at 101.2 W.L.

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 a grant of special temporary authority (“STA”)<sup>1</sup> for 60 days commencing July 24, 2019 to drift its T9S satellite (Call Sign S2669) from its current location at 101.1° W.L. to 101.2° W.L. and to operate the satellite at 101.2° W.L. DIRECTV is simultaneously filing a space station modification application to permanently change the authorized orbital location of T9S from 101.1° W.L. to 101.2° W.L.

T9S is permanently authorized to operate at 101.1° W.L.<sup>2</sup> DIRECTV’s T4S satellite (Call Sign S2430) is permanently authorized to operate at 101.2° W.L.<sup>3</sup> T4S is approaching the end of its operational life, and DIRECTV plans to deorbit the satellite later this year. In connection with the deorbiting of T4S, DIRECTV plans to relocate T9S to 101.2° W.L. and to transfer all traffic from T4S to T9S. DIRECTV plans to relocate T9S from 101.1° W.L. to 101.2° W.L. as early as July 24, 2019, and the drift period is expected to last approximately five days. Once relocated, T9S will initially be collocated with T4S for approximately six weeks while traffic is transferred from T4S to T9S, and T4S will then be deorbited. As noted above, DIRECTV is simultaneously filing a space station modification application to permanently change the authorized orbital location of T9S from 101.1° W.L. to 101.2° W.L.

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

<sup>2</sup> See *Policy Branch Information; Actions Taken*, Public Notice, Report No. SAT-01226, File No. SAT-MOD-20161219-00128 (Mar. 24, 2017).

<sup>3</sup> See *Policy Branch Information; Actions Taken*, Public Notice, Report No. SAT-00838, File No. SAT-MOD-20111102-00211 (Jan. 20, 2012).

During the drift of T9S from 101.1° W.L. to 101.2° W.L., DIRECTV will utilize only the satellite's telemetry, tracking, and command ("TT&C") frequencies and will follow industry practices for coordinating TT&C transmissions during the relocation process. The specific TT&C frequencies are as follows:

- 12695.5 MHz (space-to-Earth); and
- 17795.0 MHz (Earth-to-space).

Once relocated to 101.2° W.L., DIRECTV seeks authority to operate on the Ku-DBS (12.2-12.7 GHz (space-to-Earth) and 17.3-17.8 GHz (Earth-to-space)) and Ka-Band (18.3-18.8/19.7-20.2 GHz (space-to-Earth) and 28.35-28.6/29.25-29.5/29.5-30.0 GHz (Earth-to-space)) communications frequencies already licensed to T9S at the nominal 101° W.L. orbital location.<sup>4</sup>

Grant of this STA request will not result in increased risk of harmful interference. As noted above, DIRECTV will operate only the above-listed TT&C frequencies during the drift and will coordinate its TT&C transmissions with operators of satellites in the drift path. In the unlikely event that any interference should occur during the drift, DIRECTV will take all reasonable steps to eliminate such interference. Once on station at 101.2° W.L., DIRECTV will operate the communications payload in conformance with FCC rules and any relevant coordination agreements.

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<sup>4</sup> Because DIRECTV will provide DBS service using 12/17 GHz frequency bands already assigned to DIRECTV for use at the nominal 101° W.L. orbital location, this application for special temporary authority does not implicate the Commission's freeze on new DBS applications. *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).



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 T4S, which DIRECTV will manage internally to ensure safe station-keeping, T9S 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 T9S at 101.2° W.L. DIRECTV is also not aware of any other system with an overlapping station-keeping volume with T9S 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 facilitate the transfer of traffic from T4S to T9S in connection with the decommissioning of DIRECTV's T4S satellite, thereby ensuring continuing service coverage to DIRECTV customers. Accordingly, DIRECTV respectfully requests that the Commission grant this request.