

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

In the Matter of)	
)	
DIRECTV ENTERPRISES, LLC)	File Nos. SES-MFS-20140924-00753
)	SES-MFS-20140924-00754
Request for Modification of Earth)	SES-MFS-20140924-00755
Station Licenses)	SES-MFS-20140924-00756
)	SES-MFS-20140924-00757
)	SES-MFS-20140924-00758
)	SES-MFS-20140924-00759
)	SES-MFS-20140924-00760
)	SES-MFS-20140924-00761
)	SES-MFS-20140924-00762
)	SES-MFS-20140924-00763
)	SES-MFS-20140924-00764
)	SES-MFS-20140924-00765
)	SES-MFS-20140924-00766
)	SES-MFS-20140924-00767
)	SES-MFS-20140924-00768
)	SES-MFS-20140924-00770
)	SES-MFS-20140924-00771
)	SES-MFS-20140924-00772
)	SES-MFS-20140924-00773
)	SES-MFS-20140924-00774

COMMENTS OF IRIDIUM CONSTELLATION LLC

Iridium Constellation LLC (“Iridium”) hereby comments on the above-captioned applications filed by DIRECTV Enterprises, LLC (“DIRECTV”). Iridium has no objection to a grant of the applications, but is filing these comments to clarify certain matters.

In its applications, DIRECTV seeks authority to add “ALSAT” as a point of communication for its above-referenced earth stations, which are at various locations. The earth stations operate on Ka-band frequencies, including the 29.25-29.3 GHz sub-band. DIRECTV operates Ka-band geostationary orbit satellites (“GSO”) with which its earth stations communicate. Iridium operates a constellation of non-geostationary orbit (“NGSO”) satellites that use Ka-band frequencies, including the 29.25-29.3 GHz sub-band, for feeder links.

Pursuant to the Commission’s requirements for the shared 29.25-29.5 GHz band,¹ DIRECTV provided the same exhibit with each of its applications. In the exhibit, DIRECTV concludes that its proposed earth station transmissions will not cause unacceptable interference to Iridium’s feeder links. One of the bases for this conclusion is the similarity between the Ka-band earth station antennas that are the subject of the above-referenced applications and the Ka-band earth station antennas for which DIRECTV was granted licenses in 2011.

Iridium previously filed comments concerning DIRECTV’s 2011 applications. In its 2011 comments, Iridium stated that it had no objection to a grant of DIRECTV’s applications but took issue with elements of the methodology DIRECTV used in analyzing the potential for interference to Iridium’s feeder links.² Iridium continues to have these methodological concerns, and is filing these comments because it does not

¹ See Section 25.203(k) of the Commission’s rules, 47 C.F.R. § 25.203(k).

² See Comments of Iridium Constellation LLC, FCC File Nos. SES-MFS-20111104-01314, SES-MFS-20111104-01315, SES-MFS-20111104-01317, SES-MFS-20111104-01320, SES-MFS-20111104-01322, and SES-MFS-20111104-01324 (Dec. 16, 2011).

wish its lack of objection to DIRECTV's latest applications to be viewed as an endorsement of all elements of DIRECTV's methodology.

Iridium also notes that Section 25.258(a) of the Commission's rules requires coordination between operators of GSO FSS earth stations and NGSO MSS feeder links using frequencies in the 29.25-29.5 GHz band. In light of the analysis provided by DIRECTV, Iridium believes there should be no impediment to a successful coordination in this matter. Iridium reserves the right, however, to seek relief should the outcome of its coordination with DIRECTV, or the outcome of any future coordination, prove unsatisfactory.

Respectfully submitted,

IRIDIUM CONSTELLATION LLC

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November 25, 2014

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Comments of Iridium Constellation LLC was sent via first class mail, postage prepaid, this 25th day of November, 2014, to the following:

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/s/ Joseph A. Godles
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