

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

In the Matter of )  
 )  
DIRECTV ENTERPRISES, LLC ) File Nos. SES-MOD-20141103-00841  
 )  
Request for Modification of Earth )  
Station License )  
 )

**COMMENTS OF IRIDIUM CONSTELLATION LLC**

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

In its application, DIRECTV seeks authority to add “ALSAT” as a point of communication for its above-referenced earth station in Los Angeles, California. The earth station operates 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 station communicates. 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,<sup>1</sup> DIRECTV provides an exhibit in which 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 application 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.<sup>2</sup> Iridium continues to have these methodological concerns, and is filing these comments because it does not wish its lack of objection to DIRECTV's latest application to be viewed as an endorsement of all elements of DIRECTV's methodology.

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<sup>1</sup> See Section 25.203(k) of the Commission's rules, 47 C.F.R. § 25.203(k).

<sup>2</sup> 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).

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**

By: /s/Donna Bethea Murphy

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January 16, 2015

## 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 16th day of January, 2015, to the following:

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Attention: Jack Wengryniuk\*

/s/ \_\_\_\_\_  
Deborah Wiggins