

EXHIBIT 1

APPLICATION FOR MODIFICATION AND WAIVER REQUEST (Response to FCC Form 312, Question 43)

Pursuant to 47 C.F.R. § 25.117, DIRECTV Enterprises, LLC (“DIRECTV”) seeks modification of its licenses for certain fixed earth station sites listed in Attachment A to correct the authorized geographic coordinates. Other than the proposed changes in geographic coordinates, DIRECTV certifies under 47 C.F.R. § 25.117(c) that the remaining license information has not changed, and such information is incorporated by reference. To the extent necessary, DIRECTV requests a waiver of the requirement to provide supporting technical documentation such as the unchanged technical information on Schedule B and the frequency coordination report for those earth stations in shared frequency bands.

During a review of its license records, DIRECTV recently determined that the authorized geographic coordinates (latitude and/or longitude specified in NAD-83) differed by more than one second from the actual location for some of its earth station antennas identified by Google Earth WGS84. DIRECTV files this application to update the FCC’s database to reflect the actual coordinates identified using Google Earth WGS84.¹ To the extent required, DIRECTV requests a waiver of 47 C.F.R. § 25.117(a)’s prior approval requirement to permit operations at such minor variance. As shown in Attachment A, the corrected earth station site locations exceed the one-second variance permitted under 47 C.F.R. § 25.118(a)(4)(vi).

A waiver of the Commission’s rules is warranted upon a showing of “good cause”² and may be granted if it “would not undermine the policy objective of the rule in question and would otherwise serve the public interest.”³ With one exception, the existing earth station sites are less than ten seconds away in latitude or longitude from their authorized geographic coordinates. Such *de minimis* variance is not substantially different from other earth station location changes permitted without prior Commission approval under 47 C.F.R. § 25.118(a)(4)(vi). Moreover, DIRECTV to date has not received any complaints of harmful interference resulting from operations at the existing earth station locations.

Thus, grant of the requested waiver is consistent with underlying policy objectives to maintain the accuracy of the Commission’s licensing records and prevent harmful interference to other authorized users. The requested grant also will serve the public interest by allowing existing earth station operations to continue without service interruptions. Accordingly, DIRECTV urges prompt Commission approval of its proposed minor modification, along with the requested waiver to the extent required.

¹ Data entry limitations in IBFS currently prevent applicants from inputting geographic coordinates in a geodetic datum other than NAD-27 or NAD-83 in Schedule B to FCC Form 312.

² 47 C.F.R. § 1.3; see also *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969).

³ *DIRECTV Enterprises, LLC Application for Milestone Extension for DIRECTV RB-2*, Order, 30 FCC Rcd 4796, ¶ 5 (2015).

Attachment A

DIRECTV Earth Station Antenna Sites

Call Sign	Site ID	City/State Location	Licensed Coordinates (Lat./Lon.)		Actual Coordinates (Lat./Lon.)		Variance (Lat./Lon.)
E010129	LABC	Los Angeles, CA	33° 59' 1.0"	118° 25' 27.0"	33° 58' 58.75"	118° 25' 31.5"	2.25" / 4.5"
E010130	CRBC	Castle Rock, CO	39° 16' 37.0"	104° 48' 24.0"	39° 16' 38.6"	104° 48' 25.4"	1.6" / 1.4"
E060014	NEUF	New Hampton, NH	43° 37' 12.0"	71° 38' 24.0"	43° 37' 24.2"	71° 38' 32.4"	12.2" / 8.4"
E060298	NWDF	Ellensburg, WA	46° 59' 56.4"	120° 33' 52.5"	46° 59' 55.6"	120° 33' 56.95"	0.8" / 4.45"
E060299	NWUF	Moxee, WA	46° 33' 55.5"	120° 23' 53.4"	46° 33' 54.5"	120° 23' 57.1"	1.0" / 3.7"
E070023	SWDF	Benson, AZ	31° 58' 22.4"	110° 18' 16.7"	31° 58' 22.3"	110° 18' 17.75"	0.1" / 1.05"
E070074	MWDF	Big Lake, MN	45° 19' 39.2"	93° 41' 50.5"	45° 19' 40.5"	93° 41' 49.4"	1.3" / 1.1"
E070111	SWUF	Tucson, AZ	32° 5' 31.3"	110° 47' 14.1"	32° 5' 33.0"	110° 47' 14.9"	1.7" / 0.8"
E070122	LABC	Los Angeles, CA	33° 58' 59.6"	118° 25' 25.7"	33° 58' 57.8"	118° 25' 30.7"	1.8" / 5.0"
E080026	CRDUF	Englewood, CO	39° 33' 35.7"	104° 51' 47.6"	39° 33' 36.8"	104° 51' 47.7"	1.1" / 0.1"
E090025	LABC	Los Angeles, CA	33° 58' 59.2"	118° 25' 26.0"	33° 58' 57.6"	118° 25' 31.0"	1.6" / 5.0"
E090069	LABC	Los Angeles, CA	33° 59' 0.0"	118° 25' 27.0"	33° 58' 59.45"	118° 25' 30.4"	0.55" / 3.4"
E090076	NEUF	New Hampton, NH	43° 37' 26.7"	71° 38' 32.5"	43° 37' 26.6"	71° 38' 33.6"	0.1" / 1.1"
E160062	LABC	Los Angeles, CA	33° 58' 59.7"	118° 25' 28.2"	33° 58' 58.0"	118° 25' 33.0"	1.7" / 4.8"
E930304	CRBC	Castle Rock, CO	39° 16' 37.0"	104° 48' 29.0"	39° 16' 38.1"	104° 48' 29.5"	1.1" / 0.5"
E990159	LABC	Los Angeles, CA	33° 58' 56.0"	118° 25' 28.5"	33° 58' 57.1"	118° 25' 31.8"	1.1" / 3.3"