



June 1, 2011

BY ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: *IB Docket No. 06-123*

Dear Ms. Dortch:

On May 31, 2011, Stacy Fuller, Jack Wengryniuk, and undersigned counsel representing DIRECTV, Inc. (“DIRECTV”) had separate meetings with Louis Peraertz, Legal Advisor to Commissioner Clyburn, and Mark Stone, Chief of Staff and Senior Policy Advisor to Commissioner Copps, related to the above referenced proceeding. In these meetings, DIRECTV reiterated the importance of safeguarding the entire “cluster” around the nominal orbital locations assigned to the United States under the international BSS Plan. If a 17/24 GHz BSS satellite were allowed to operate too close to such a cluster, part of that cluster (and the international protections to which it is entitled) would no longer be available for use by U.S. DBS satellites. This would reduce operational flexibility that has been an important tool for U.S. DBS systems in the past, and could prevent the introduction of new DBS services that require the launch of new satellites. Operating outside the cluster is not an alternative, as doing so would compromise international protections currently enjoyed by all satellites operating within the cluster. DIRECTV also noted that protecting U.S. clusters would have a *de minimus* effect on competitive entry, as the potential for overlap of DBS and 17/24 GHz BSS systems is very small. DIRECTV provided the attached documents to illustrate its concerns.

Respectfully submitted,

/s/

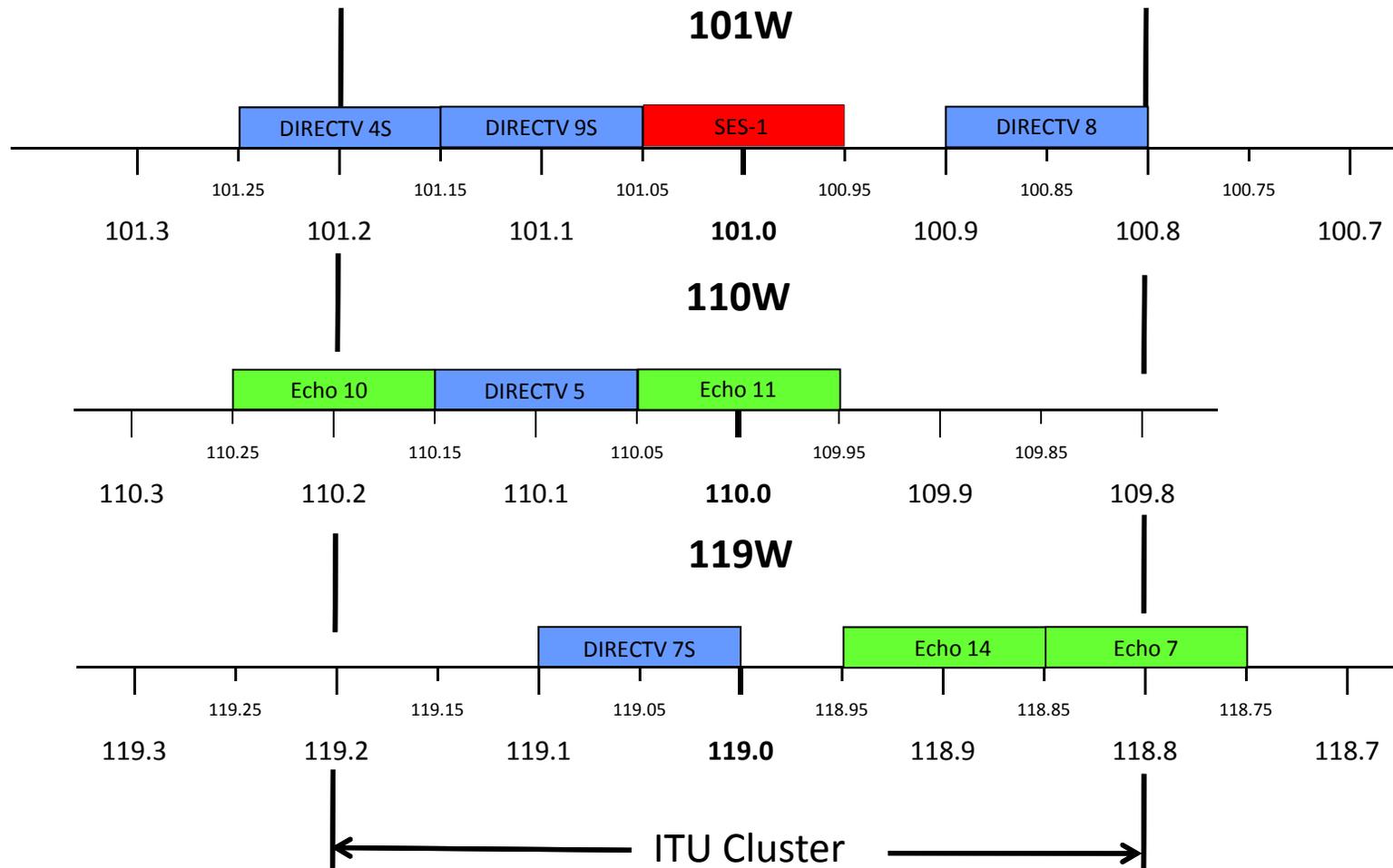
William M. Wiltshire
Counsel for DIRECTV, Inc.

Attachments

cc: Louis Peraertz
Mark Stone

Current US DBS Satellite Configuration

4-27-11



BSS Plan Interference

Normal operations inside the cluster



Impact of operating just outside the cluster

