

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

In the Matter of

AMENDMENT OF PARTS 1, 2, 15, 74, 78, 87, 90, AND 97
OF THE COMMISSION'S RULES REGARDING
IMPLEMENTATION OF THE FINAL ACTS OF THE WORLD
RADIOCOMMUNICATION CONFERENCE (GENEVA, 2007)
(WRC-07), OTHER ALLOCATION ISSUES, AND RELATED
RULE UPDATES

ET Docket No. 12-338

COMMENTS OF DIRECTV, LLC

DIRECTV, LLC (“DIRECTV”) comments in this proceeding to support the Commission’s proposal to delete the Radionavigation Service (“RNS”) allocation in the 24.75-25.05 GHz band.¹ This modification will serve the public interest by conforming the Commission’s frequency allocation to the international allocation table, recognizing the fact that no radionavigation systems are currently operating in or planned for this band, and eliminating any potential conflict with licensees in the 17/24 GHz Broadcasting Satellite Service (“17/24 GHz BSS”).

¹ See *Amendment of Parts 1, 2, 15, 74, 78, 87, 90, and 97 of the Commission’s Rules Regarding Implementation of the Final Acts of the World Radiocommunication Conference (Geneva, 2007) (WRC-07), Other Allocation Issues, and Related Rule Updates*, 27 FCC Rcd. 14598, ¶ 104 (2012) (“Notice”).

DIRECTV is licensed to launch and operate two 17/24 GHz BSS satellites, which use the 24.75-25.25 GHz band for Earth-to-space feeder links. It has begun construction of those systems, and expects to launch its first spacecraft within the next year. The additional capacity available in this band could be used enhance DIRECTV's existing direct-to-home multichannel video service by, for example, supporting bandwidth-hungry formats such as 3D or ultra-HD. Other parties are also authorized by the Commission either to operate 17/24 GHz BSS space stations or to provide 17/24 GHz BSS service in the United States from non-U.S. licensed space stations.²

As discussed in the *Notice*, the Commission has allocated the 24.75-25.25 GHz band to the Fixed-Satellite Service (Earth-to-space) on a primary basis for non-Federal use, and has restricted this allocation for use by BSS feeder links.³ That is also the sole allocation of this band under the ITU's international allocation table, with BSS feeder links again given priority.⁴ Nonetheless, the U.S. table also includes an allocation of the 24.75-25.05 GHz portion of this band to RNS on a co-primary basis for Federal and non-Federal use. This RNS allocation is unused in the United States, and does not appear to be part of future plans for spectrum use by Federal RNS systems.⁵

² See, e.g., *Spectrum Five LLC*, 27 FCC Rcd. 13129 (IB 2012); IBFS File No. SAT-LOA-20090807-00084.

³ *Notice*, ¶ 102 (citing 47 C.F.R. § 2.106 and NG 167). The *Notice* also discusses a petition filed by Xanadoo Company and Spectrum Five LLC that requests both deletion of the RNS allocation in this band and amendment of NG 167 to permit other digital uplinks associated with BSS and blanket licensing of two-way earth stations in the 17/24 GHz BSS spectrum. *Id.*, ¶ 103. Although DIRECTV opposes that petition, it will not address its concerns here in light of the Commission's statement that it is not seeking comment on those proposals in this proceeding. *Id.*, n.193.

⁴ *Id.*, ¶ 101.

⁵ *Id.*, ¶ 104 and n.194.

