April 1, 2011

Ms. Marline H. Dortch, Secretary Federal Communications Commission 445 12th Street SW Washington, DC 20554

Ex Parte Comments: In the Matter of LighSquared Subsidiary LLC Request for Modification of its Authority for an Ancillary Terrestrial Component; SAT-MOD-20101118-00239

Ms. Dortch:

On behalf of the National Association of Wheat Growers (NAWG), a federation of 21 state associations of wheat growers, I write to share our concern about the recent decision by the Federal Communications Commission (FCC) to grant a waiver to LightSquared Subsidary LLC to use satellite spectrum in a way that will jeopardize the business practices of wheat growers nationwide. We are concerned about the intrusive radio interference that will result from LightSquared's high powered wireless broadband networks that will limit if not completely block accuracy and availability of Global Positioning Satellite (GPS) systems used on our farms.

The investment in GPS hardware and software by individual wheat growers across the country over the past five years often exceeds \$20,000. There are over 160,000 wheat farms in the U.S. and a sizable portion of them are now utilizing GPS technology for an estimated total net investment of about \$3 billion from wheat farmers alone. GPS increases the productivity and efficiency of many processes on the farm including planting, fertilizing, treating with crop protection products as well as harvesting while minimizing the environmental impact of these processes. GPS technology allows extremely accurate field work and allows use of less fuel, fertilizer, and pesticides. Degradation of GPS service in rural areas from interference adversely impact growers' ability to use this valuable technology and increases the downtime on the farm. In many cases the timeframe for these processes is very short and downtime is extremely costly to the farm's profitability.

If clear and adequate GPS signals are not available, then growers' investment in higher productivity and reduced environmental impact would be wasted. Wheat growers advocate strongly for more access to broadband communications, but not at the expense of their ability to utilize GPS technology. NAWG urges the FCC to reconsider the waiver granted to LightSquared. NAWG requests the FCC to initiate a public and transparent rulemaking on the viability of L-band frequencies for new uses to allow an open and full consideration of the impact the waiver will have on growers' ability to farm their land in the most efficient manner possible.

Thank you for considering our concerns and requested actions.

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Sincerely.

Dana J. Peterson Chief Executive Officer