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Sent: Sunday, June 12, 2011 8:23 PM
To: FCCINFO
Cc: Robert Nelson; Kathryn Medley; Stephen Duall
Subject: LightSquared FCC File No. SAT-MOD-20101118-00239

RE: LightSquared FCC File No. SAT-MOD-20101118-00239

I support the following statements prepared by the Coalition to Save Our GPS
(<http://www.saveourgps.org>)

The FCC must make clear, and the NTIA must ensure, that LightSquared's license modification is contingent on the outcome of the mandated study unequivocally demonstrating that there is no interference to GPS. The study must be comprehensive, objective, and based on correct assumptions about existing GPS uses rather than theoretical possibilities. Given the substantial pre-existing investment in GPS systems and infrastructure, and the critical nature of GPS applications, the results of studies must conclusively demonstrate that there is no risk of interference. If there is conflicting evidence, doubts must be resolved against the LightSquared terrestrial system. The views of LightSquared, as an interested party, are entitled to no special weight in this process.

The FCC should make clear that LightSquared and its investors are proceeding **at their own risk** in advance of the FCC's assessment of the working group's analysis. While this is the FCC's established policy, **the Commission's International Bureau failed to make this explicit in its order.**

Resolution of interference has to be the obligation of LightSquared, not the extensive GPS user community of millions of citizens. LightSquared must bear the costs of preventing interference emanating from their devices, and, **if there is no way to prevent interference, it should not be permitted to operate. GPS users or providers should not have to bear any of the consequences of LightSquared's actions.**

This is a matter of critical national interest. There must be a reasonable opportunity for public comment of at least 45 days on the report produced by the working group and further FCC actions on the LightSquared modification order should take place with the approval of a majority of the commissioners, not at the bureau level.

Finally, I question the motivation and rationale behind the conditional waiver issued by the Commission's International Bureau, particularly in view of the fundamental technical reasons for the on-going Sprint/Nextel 800 MHz Rebanding proceeding (WT 02-55) or the BPL (Broadband over Power Lines) debacle. Approval of the waiver on behalf of the LightSquared plan, in my opinion, proves that the Commission has still not learned their lesson about protecting and managing the RF spectrum in a truly responsible manner.

Respectfully,

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