

Julius Genachowski, Chairman
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

June 15, 2011

ERRATUM
FCC File No. SAT-MOD-20101118-00239--*LightSquared Application for Modification*

Dear Mr. Chairman,

The GPS-LightSquared debate has been sadly positioned as a “win-lose” dilemma, suggesting a winner-take-all outcome - that in order for one technology to exist, the other must lose. That is unfortunate and shortsighted.

Obviously, GPS is a very important national asset; it has dramatically improved the lives of millions of Americans with significant military and civilian applications. Nationwide wireless broadband is also an essential and critical initiative; indeed, the FCC’s National Broadband Plan seeks to identify 500 MHz of additional wireless broadband spectrum. Rationalizing the Mobile Satellite Services spectrum bands for increased terrestrial broadband use is a valuable mechanism for achieving this goal. Securing *both* GPS and nationwide wireless broadband should be and can be the goal.

Recognizing that demand for wireless broadband services and applications is dramatically increasing and that today’s wireless networks are unable to meet this projected demand, the FCC correctly supported the development of LightSquared’s new, nationwide 4G-LTE network complemented with satellite coverage as a way of significantly expanding broadband access across the country. From commercial launch, it will offer the entire nation coverage through its satellites, as well as extending ground based broadband service to over 92% of the population by 2015. The combination of satellite and ground based services provides the only feasible way to offer meaningful, ubiquitous nationwide wireless communications, including to un-served and underserved rural communities across America.

Wireless services have become an invaluable engine for productivity and innovation in the U.S. economy, and they play a critical component in the U.S. retaining its lead in global competitiveness. The importance of building the world’s first ever nationwide end-to-end full IP wireless network and taking the global lead in LTE deployment cannot be overstated. Once complete, the LightSquared network will sharply increase the nation’s broadband capacity, enhancing wireless competition and providing additional choice in the wireless industry. Moreover, its unique, collaborative open-platform design combined with its 100% wholesale business model promises to spawn innovation by supporting new entrants and leading edge applications. LightSquared is enabling an ecosystem of third party software, hardware, and applications providers who will collectively seek to transform not only the wireless industry, but also other industries such as health care, automotive, transportation, education, media, entertainment, and energy. In a highly competitive 21st century global economy, the U.S. cannot afford to stifle such innovation.

The cooperative testing of LightSquared/GPS interference, conducted at the direction of the FCC, is one of the most comprehensive studies of interference ever undertaken. While it is likely there will be interference issues that will need to be solved, the parties and the FCC must have the room to develop a “win-win” solution for America.

It is imperative, and in the vital interest of the country, that the FCC create an environment where LightSquared and GPS can co-exist. Indeed, crafting such a solution is consistent with the charter of the FCC, who defines its mission as promoting competition, innovation, and investment in broadband services and encouraging the highest and best use of spectrum.

The U.S. has successfully integrated different technologies before, and it can and must do so again.

Sincerely,



The Competitive Carriers Association



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