

LAW OFFICES
GOLDBERG, GODLES, WIENER & WRIGHT
1229 NINETEENTH STREET, N.W.
WASHINGTON, D.C. 20036

HENRY GOLDBERG
JOSEPH A. GODLES
JONATHAN L. WIENER
DEVENDRA ("DAVE") KUMAR
LAURA A. STEFANI

(202) 429-4900
TELECOPIER:
(202) 429-4912
general@g2w2.com

—
HENRIETTA WRIGHT
THOMAS G. GHERARDI, P.C.
COUNSEL

—
THOMAS S. TYCZ*
SENIOR POLICY ADVISOR
*NOT AN ATTORNEY

July 6, 2011

ELECTRONIC FILING

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

**Re: FCC File No. SAT-MOD-20101118-00239;
IB Docket No. 11-109**

Dear Ms. Dortch:

On June 30, 2011, LightSquared Subsidiary LLC ("LightSquared") filed its Recommendation and the Final Report of the Technical Working Group convened by LightSquared and the U.S. GPS Industry Council in the above-captioned matter.

In assembling the full Report from the various contributions received from working group sub-teams, the numbering for some of the figures and tables in the appendix for the High Precision, Networks & Timing section were reset incorrectly. The attached versions correct these errors and replace in their entirety the third (containing updated Appendices H.1.1 to H.1.9) and fourth (containing, among others, updated Appendices H.1.10 to H.1.13) of the four appendix files submitted as part of the TWG Final Report on June 30. To clarify, the attached replacement versions correct some incorrectly labeled figures and tables but make no substantive or other changes in the documents filed on June 30.

Additionally, upon making these corrections, some of the referenced figure numbers in the TWG Final Report changed and were no longer correct. LightSquared hereby makes the following corrections to the figure references in that document:

Document	Page	Original Reference	Corrected Reference	Text
TWG Final Report – Part 1 – Report.pdf	Pg. 243	“Figure 28”	“Figure 36”	“The comparative test results in the Figure 28 below demonstrate that the High Precision GPS devices in normal operational conditions, without the presence of a LightSquared signal,…”
TWG Final Report – Part 1 – Report.pdf	Pg. 245	“Figure 29”	“Figure 37”	“It is clearly demonstrated in Figure 29 that the timing devices are generally immune to lower 10 MHz channel (with the exception of one outlier which begins to degrade at -40 dBm).”
TWG Final Report – Part 1 – Report.pdf	Pg. 265	“Figure 42”	“Figure 50”	“LightSquared also notes that Figure 42 shows deployment from a dual channel (F10H+F10L) configuration, and does not account for critical factors such as antenna patterns and loss inserted due to morphology (building clutter, etc.).”
TWG Final Report – Part 1 – Report.pdf	Pg. 266	“Figure 45”	“Figure 53”	“However, Figure 45 overstates the area where such susceptibility exists due to the following factors:”
TWG Final Report – Part 1 – Report.pdf	Pg. 267	“Figure 43”	“Figure 51”	“It utilizes unduly conservative propagation models that are not specifically tuned for local terrain and morphology; Figure 43 demonstrates how both the free space LOS and WI-LOS models greatly overstate signal propagation, especially as the distance from a cell site grows.”
TWG Final Report – Part 1 – Report.pdf	Pg. 281	“Figure 52” (referenced 3 times)	“Figure 60”	“LightSquared does not disagree with the measurements that are shown in Figure 52 , but does disagree with the assessment of the impact to high precision GPS users. Figure 52 demonstrates that the free space LOS model is an accurate predictor of the worst case signal propagation from an interference perspective. Figure 52 clearly shows how the measured signal strength is clustered…”

Please do not hesitate to contact me with any questions.

Respectfully submitted,



Devendra T. Kumar
Counsel for LightSquared Subsidiary LLC