Wisconsin Department of Transportation

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July 28, 2011

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

Re: LightSquared Subsidiary LLC. Request for Modification of Its Authority for an Ancillary Terrestrial Component, IBFS File No. SAT-MOD-20101118-00239

Dear Ms. Dortch:

I am writing to express my strong opposition to plans announced by LightSquared to construct and operate 40,000 high-powered broadband transmitters in the satellite spectrum adjacent to the low-powered Global Positioning System (GPS) spectrum.

The five-month study by the Technical Working Group (TWG) demonstrated conclusively that LightSquared's plans would cause widespread, harmful, drowning-out interference to GPS receivers. In a June 30, 2011 document, LightSquared contends a lower band of the spectrum would solve the GPS interference issues. The Wisconsin Department of Transportation (WisDOT) believes their claim should not be taken at face value and be thoroughly studied by a neutral third party.

If allowed to continue with its plans, the interference created by LightSquared would endanger the use of GPS in civil, military and commercial sectors. This would include aviation, transportation, disaster management, scientific research, high-precision agriculture, road construction, surveying and mapping.

Using state and federal funds, WisDOT has invested approximately $20 million over the past five years in a Height Modernization Program that consists of high-precision, permanent GPS reference stations and an associated passive survey network backbone. The GPS Continuously Operating Reference Station (CORS) network is heavily utilized by more than 900 registered users, including the road construction industry, high-precision agricultural and municipal and private land surveyors who rely on the two centimeter accuracy to perform their work. Contractors and farmers who use GPS-controlled bulldozers, farm equipment, pavers and motor graders have become dependent on the CORS network to help make their businesses more efficient and profitable.

The department requests the FCC insist on a new study to conclusively demonstrate there will be no interference to GPS reception before LightSquared is permitted to proceed. As an alternative, WisDOT requests that the FCC require LightSquared to use another spectrum that is not adjacent to the GPS spectrum.

Thank you for your consideration of and attention to these matters and continued commitment to ensuring the GPS spectrum remains fully functional and free of interference for a variety of users.

Sincerely,

Mark Gottlieb, P.E.
Secretary