



June 15, 2011

FILED ELECTRONICALLY

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

Dear Ms. Dortch:

**Re: Request for extension of time
Call Sign S2358
LightSquared Application for Modification -- FCC File No. SAT-MOD-20101118-00239**

In an Order and Authorization in the above-referenced proceeding,¹ the International Bureau established a framework for a working group to examine the issue of GPS receiver overload and required LightSquared to file a monthly series of reports on the results of the working group, culminating with a final report to be submitted on or before June 15, 2011. The International Bureau also “reserve[d] the right to adjust the reporting dates and requirements in consultation with NTIA.”²

LightSquared hereby requests an extension of time, through and including July 1, 2011, to file the final report. For the reasons stated below, LightSquared’s request is supported by good cause.

Producing a final report is a massive undertaking. The test development, device selection, laboratory set-up, data compilation, analysis, and drafting that are preconditions to a final report require coordination among numerous parties (most of which have detailed numerous representatives to the working group), including LightSquared, GPS device manufacturers, and federal agencies.

All parties have been working diligently towards the goal of having a final report ready in time for a June 15 filing. However, despite the group’s best efforts, it has been unable to produce a complete report in time. Among the main reasons for the slight delay has been that based on preliminary test results, LightSquared determined that additional testing, beyond what had been planned initially, including alternative frequency plans to support its network roll-out, was necessary to permit a proper evaluation of various mitigation options for addressing the GPS

¹ DA 11-133 (Jan. 26, 2011).

² *Id.* ¶ 43.

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receiver overload issue. That testing has been performed, and it has set back the timetable, particularly in some sub-teams in which data is still being processed and analyzed. Moreover, the analysis of the test results has proven to be time consuming and has required in depth discussion. In addition, LightSquared must consider the results from all GPS receiver categories in its analysis, and does not want to proceed with filing a report that is incomplete in important ways.

Although LightSquared had held out hope that a final report could be completed by today notwithstanding the additional testing and analysis, it has become apparent that a June 15 filing will not be possible. Proper resolution of the GPS receiver overload issue is not possible without a final report that has been adequately considered, documented, and reviewed before it is filed. Additional time is needed to complete these critical tasks.

The International Bureau's Order and Authorization provides that LightSquared may not begin commercial service in accordance with the authority granted thereunder until the Commission finds that the working group process has been successfully completed. LightSquared recognizes that the extension it is requesting, which may span a little more than two weeks, could delay such a Commission finding and is willing to take that chance.

Accordingly, and for good cause shown, LightSquared respectfully requests an extension until July 1 of the final report filing deadline.

Respectfully submitted,

/s/Jeffrey Carlisle
Executive Vice President
Regulatory Affairs & Public Policy

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