July 29, 2013

Via Electronic Filing

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Room TW-A325
Washington, D.C. 20554


Dear Ms. Dortch:

On July 25, 2013, Russell H. Fox, counsel for Trimble Navigation Limited (“Trimble”), M. Anne Swanson, counsel for Garmin International, Inc. (“Garmin”), and the undersigned, as counsel for Deere & Company (“Deere”) (Trimble, Garmin and Deere are all founding members of the GPS Innovation Alliance and are collectively referred to herein as the “GPS Parties”) met with Louis Peraetz (Legal Advisor to Acting Chairwoman Mignon Clyburn) and separately with David Goldman (Legal Advisor to Commissioner Jessica Rosenworcel).

As active participants in the above-referenced proceedings, the GPS Parties expressed their continuing interest in the Commission’s consideration of LightSquared’s various pending applications and revised proposals. Although the GPS Parties are committed to working with the Commission and LightSquared on the challenging interference issues raised by LightSquared’s proposals, we discussed the fact that LightSquared’s requests and evolving proposals must be carefully assessed to determine the impact on the Global Positioning System (“GPS”) and the many millions of government and consumer users that rely on GPS for many applications, including applications critical to health and safety and major industries. The GPS Parties are on record as having significant concerns regarding the potential for LightSquared’s proposals, as modified, to interfere with GPS signals. We discussed the continuing concern of the GPS Parties regarding interference and urged Commission staff to require rigorous and comprehensive analysis of the current proposals, including LightSquared’s proposal to use the 1626.5-1660.5 MHz band for uplink signals. Until the record is complete regarding, among other things, the use of that band for uplinks signals, the Commission should take no action on LightSquared’s requests. The GPS Parties look forward to working constructively with LightSquared and Commission staff on these matters.
Please do not hesitate to contact the undersigned with any questions.

Respectfully Submitted,

/electronically signed/
Catherine Wang

cc: Louis Peraetz
    David Goldman