September 18, 2014

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 September 16, 2014, on behalf of the GPS Innovation Alliance (“GPSIA”), Jim Kirkland, President of the GPSIA and General Counsel of Trimble Navigation Limited (“Trimble”); Russell H. Fox, outside counsel for Trimble; M. Anne Swanson, outside counsel for Garmin International, Inc. (“Garmin”); and the undersigned, as outside counsel for Deere & Company (“Deere”) met separately with each of the following regarding the above-referenced proceedings: Jonathan Chambers, Chief of the Office of Strategic Planning & Policy Analysis; Charles Mathias, Associate Bureau Chief of the Wireless Telecommunications Bureau; Phil Verveer, Senior Counselor, Renee Gregory, Legal Advisor, and Leah Rabkin, Intern, to Chairman Tom Wheeler. (Trimble, Garmin and Deere are all founding members of the GPSIA and are collectively referred to herein as the “GPS Parties”).

The GPS Parties expressed their commitment to continuing a constructive dialogue with the Commission with respect to the existing and potential uses of spectrum bands adjacent to the Radio Navigation Satellite Service (“RNSS”) spectrum which supports the Global Positioning System (“GPS”) in the United States. In particular, we expressed our continuing interest in the Commission’s evaluation of the various pending applications, revised proposals, and petitions filed by LightSquared Subsidiary LLC (“LightSquared”), and the Commission’s consideration of the pending petition for reconsideration filed by Trimble and Deere in connection with out-of-band (“OOBE”) interference issues in the AWS-3 proceeding.

We discussed the need to protect GPS from harmful interference and pledged continued support for the Commission’s efforts toward developing strategies for fostering new
spectrum uses that address the growing demand for LTE-based services but protect GPS receivers and services from interference. In that regard, we urged the Commission to consider long-term spectrum policy and management goals that would take into account the need to protect important existing satellite-based services, such as GPS, as well preserve interference free satellite-only spectrum that will encourage development of a wide range of valuable new applications and services. In that discussion, we referenced GPSIA’s April 25, 2014 submission to the Energy and Commerce Committee of the U.S. House of Representatives responding to the Committee’s questions on spectrum policy (attached to this notice).

Please do not hesitate to contact the undersigned with any questions.

Respectfully Submitted,

/electronically signed/

Catherine Wang
Counsel for Deere & Company

Attachment
cc: Jonathan Chambers
    Charles Mathias
    Phil Verveer
    Renee Gregory
    Leah Rabkin
    Jim Kirkland
    Russell H. Fox
    M. Anne Swanson