Commissioner Metcalfe, A. Baker  
Commissioner McFerrin L. Clippard  
Commissioner Robert J. McDowell  
cc: Commissioner Michael J. Copps  
Debra Rabel, Inc.  
Kerry McArthur, President  

Very truly yours,  

PUBLIC COMMENT

Notice of Proposed Rule-making process initiated in ET Docket No. 10-142 to ensure adequate opportunity for public comment on the proposal to remove the restriction in the Commission's regulations prohibiting the use of mobile satellite service in the 2400-2600 MHz band. We urge the Commission to consider this request from the cellphone industry, which is opposed to the removal of regulations on the basis that the proposed rulemaking process is insufficient. We urge the Commission to reconsider this proposal with the full opportunity to comment on the issue.  

Lighthearted proposal without adequate data and analysis will result in a poor decision on this huge investment.  

We request the Commission to carefully consider the following risks:

- Loss of the price advantage provided by GPS, which is essential for operation of the global system for mobile communication (GSM) network.
- Disruption of many essential military services, which rely heavily on GPS for navigation and timing.
- Loss of precision navigation for many commercial and civilian applications.
- Potential for increased costs and delays due to regulatory uncertainty.

The Lighthearted proposal will result in an unreliable GPS service, with the following effects:

- Disruption of essential communication networks.
- Disruption of essential industrial and commercial activities.
- Disruption of essential public safety services.
- Disruption of essential military operations.

This is not simply a matter of spectrum allocation. It is a public safety issue that would impact the national infrastructure.

We are deeply concerned that the proposal by Lighthearted Technology will not adequately address these concerns.

DEAR MR. GENAROWSKI:

Subject: FCC File No. SA-3-M2-0101100-00239, Lighthearted Technology, LLC, Petition for Modification of Rule 49.715

Washington, DC 20554  
445 12th Street, SW  
Room 2-B201  
Chairman, Federal Communications Commission  
The Honorable Julius Genarowski  

January 14, 2011  

Www.bevanrabel.com  
Wichita, Kansas 67209  
1800 Airport Road  
Mid-Continent Airport