January 26, 2011

The Honorable Julius Genachowski, Chairman
Federal Communication Commission
445 12th Street SW
Washington, DC 20555
Fax: 1-866-418-0232; E-mail: ecf@fcc.gov

Subject: LightSquared Application Request for Modification of Its Authority for Ancillary Terrestrial Component (ATC) (FCC File No. SAT-MOD-2010111800239)

Dear Mr. Genachowksi:

On behalf of the membership of the Institute of Navigation (ION), and with approval of the ION’s governing body, I respectfully request that the FCC carefully review the impact of the waiver application of LightSquared. While ION does not take a stand with regard to LightSquared’s specific waiver request, LightSquared’s request to modify its authority to operate a terrestrial wireless voice and data broadband service in the L-band frequencies could interfere with the use of the space-based Global Positioning System (GPS) L1 signal.

The Institute of Navigation is a 60 year old professional scientific society, organized to advance the art and science of navigation and is comprised of over 2700 professional and 110 corporate members including many of the world’s experts in the use and manufacturing of positioning, navigation and timing (PNT) technology.

Services dependent on GPS for navigation, positioning and timing reference information are viewed as an engine for economic growth, enhancing economic development, and improving safety of life. The wide ranges of these services are key components of multiple sectors of the United States’ critical infrastructure.

The ION is prepared to work within its membership to assist the FCC in identifying technical experts who might best assist the FCC in evaluating the risks and impacts of LightSquared’s proposal.

We hope that a satisfactory resolution of this matter can be reached such that the vision of LightSquared to enhance U.S. broadband access can be achieved without impacting critical PNT functionality already operating in the noted spectrum.

If we can be of further assistance please contact me at 703-366-2723.

Sincerely,

Lisa Beatty
Executive Director
E-mail: Lbeaty@ion.org

Copy: The Honorable Lawrence E. Stickling, Assistant Secretary, National Telecommunications & Information Administration, Department of Commerce, 1401 Constitution Ave., NW, Washington, D.C. 20230, E-mail: lstickling@ntia.doc.gov

Dedicated to the advancement of the art and science of positioning, navigation & timing.