March 14, 2011

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street S.W.
Washington, DC 20554

RE: In the Matter of LightSquared Subsidiary LLC Request for Modification of its Authority for an Ancillary Terrestrial Component; SAT-MOD-20101118-00239

Dear Ms. Dortch,

I am writing today on behalf of the National Corn Growers Association (NCGA) and our 35,000 members and our affiliated 48 affiliated state organizations regarding the recent decision by the Federal Communications Commission (FCC) to grant a waiver to LightSquared Subsidiary LLC to use its satellite spectrum for a purpose different than what was originally intended. NCGA is extremely concerned by the severe radio interference that will be created by the LightSquared high powered wireless broadband network resulting in a degradation of the Global Positioning Satellite (GPS) System’s accuracy and reliability. This action by the FCC which has only recently come to our attention has significant implications that could inhibit technology advancements in production agriculture.

Corn growers throughout the country have individually invested tens of thousands of dollars in GPS and high precision navigation systems to increase the productivity and efficiency of their farms. Farmers are continually in pursuit of improving their stewardship of the environment and natural resources as the science and technology evolves to enhance this effort. This effort is not one that can be compromised without significant consequences. At stake is farmers’ ability to meet the rising demand for food, feed, fuel and fiber that this country and others around the world have come to rely on year after year. A failure to protect the services of a high-precision, augmented GPS would adversely impact fertilizer and pesticide efficiencies, yield and variable rate applications. Ultimately, farm operations will have to absorb higher seed, fertilizer, fuel and wage costs.

A trend of increasing adoption of GPS based technology continues because the value becomes more apparent every year. The tractors, combines and applicators equipped with these systems will not function properly if clear and adequate signals are not available for...
application and records. In other words, if the electronics do not work, then neither does the machine.

NCGA understands the constant demand for expanding and improving consumers’ access to broadband communications and wireless services, but such a decision should not come at the peril of a business sector of such high strategic value.

NCGA strongly urges the FCC to reconsider this waiver for LightSquared because fundamentally we believe that a system defined and already in place for high precision navigation technology and variable rate application should be preserved for current industrial and consumer purposes without the potential threat of interference from the transmissions of 40,000 high-powered cellular base stations. Individuals who travel by air are reminded of the potential for unintended consequences of interference from overpowering electronic transmissions when they are asked to turn off their electronic devices.

In light of the above concerns, NCGA requests the FCC to initiate a public and transparent rulemaking on the viability of mobile satellite L-band frequencies for new uses. We also believe the FCC should take immediate action to prevent LightSquared from operating base stations on an experimental or permanent basis until a comprehensive, public and impartial evaluation of the impact on incumbent spectrum users. Finally, NCGA requests laboratory testing to evaluate the interference potential to incumbent services from any new service proposed for L-band frequencies.

NCGA appreciates your attention and consideration to our concerns and requested actions.

Sincerely,

Barton Schott
President