June 10, 2011

FILED ELECTRONICALLY

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

Re: LightSquared Application for Modification -- FCC File No. SAT-MOD-20101118-00239
Ex Parte

Dear Ms. Dortch:

On June 9, 2011, the undersigned sent without comment an electronic copy of the attached letter, which is relevant to the above-referenced proceeding, to Rick Kaplan of Chairman Genachowski’s office and Paul de Sa, Chief of the Office of Strategic Planning and Policy Analysis.

Please direct any questions concerning this matter to the undersigned.

Sincerely,

Henry Goldberg
Attorney for LightSquared

cc: Rick Kaplan
    Paul de Sa
May 25, 2011

Preparing for Coexistence
GPS, 4G Broadband and LightSquared

By Charles Werner

Firefighters require both dependable global positioning systems (GPS) and dependable wireless communications to be effective. As many fire chiefs have expressed concern over potential interference with GPS and public safety communications systems presented by LightSquared's new Long Term Evolution (LTE) broadband network, this column will serve as an informative overview.

Currently, the Federal Communications Commission (FCC) is overseeing a comprehensive and rigorous testing process to evaluate how GPS and a 4G LTE broadband system will work side by side. The FCC has stated that the broadband newcomer, LightSquared, may only launch service once the government is satisfied that potential interference concerns have been resolved. This is likely to be the largest-scale effort to prevent radio interference prior to a system launch in the U.S., ever.

While the FCC identified LightSquared as a newcomer, that is not really accurate. Under its predecessor name Sky Terra, the company launched its first satellite in 1996 and has been providing reliable and interoperable satellite voice and data services to first responders, public officials and federal agencies in urban, rural and remote areas. Many Gulf States emergency responders relied on LightSquared's satellite network after Hurricane Katrina took down terrestrial networks.

Beginning in 2001, LightSquared sought permission from the FCC to use its spectrum to build a next-generation wireless network to compliment its satellite network. The concept was to seamlessly integrate satellite and terrestrial-based wireless communications to provide reliable, affordable and ubiquitous wireless coverage for the entire U.S.

LightSquared told me that knowing its spectrum is so close to the GPS spectrum, it began to work with the GPS community almost 10 years ago to address unintended interference. In 2002, LightSquared volunteered to limit its emissions below what even the FCC permitted to prevent its signal from crossing into GPS frequencies and spent millions of dollars on filters for its cell site transmitters.

Though LightSquared has worked collaboratively over the years to make sure that its wireless network would operate without interfering with GPS, recently some GPS users, public safety officials and manufacturers raised new concerns about interference. So in January, the FCC required LightSquared and the GPS community to form a working group of technical experts to
fully study the potential behavior of GPS devices and identify mitigation measures should they be required.

The working group, co-chaired by the U.S. GPS Industry Council and LightSquared, includes 35 technical working group members and 50 advisors from the GPS industry, federal government, device manufacturers, the cellular wireless industry and public safety, among others. The working group has established subteams with expertise in cellular, general location and navigation, high-precision, networks, timing and space-based receivers. Participants from the National Public Safety Telecommunications Council (NPSTC), Association of Public-Safety Communications Officials (APCO) International, Motorola Solutions and E911 represent public safety. The cooperative testing process is underway and the final report is due to the FCC in mid-June.

On a separate but important issue, LightSquared reports it is working with major infrastructure providers to voluntarily replace public safety-critical fixed GPS timing device antennas that are operating near a proposed LightSquared transmitter. These new antennas have been proven to prevent GPS receiver interference. When such replacements are required, it will be done at no expense to public safety.

I will continue to follow the progress of the working group's testing and its report to the FCC and will keep you apprised of the results and recommendations. I am impressed by LightSquared's efforts to reach out to public safety organizations to inform them about its efforts and to seek our feedback. I believe LightSquared understands the critical need for reliable communications for first responders and is stepping up to ensure the systems can coexist.

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**Chief Charles Werner** is a 30-year veteran of the Charlottesville, Virginia, Fire Department and presently serves as its fire chief. Previously Chief Werner served as his department’s Communications Chief. Chief Werner is certified as Chief Fire Officer Designation and National Fire Academy Executive Fire Officer.

Chief Werner served as the Chairman of the SAFECOM Executive Committee from March 2008 – November 2010. Presently Chief Werner serves on the Charlottesville-Albemarle-University of Virginia Emergency Communications Center Management Board. He also serves on the Virginia’s Statewide Interoperability Executive Committee (SIEC) and served as Chair on two separate terms. Chief Werner also serves on the International Association of Fire Chief’s Communications Committee, the Digital Project Working Group Chair, and as the Technology Council Chair.

He is the recipient of a number of awards, including a three-time recipient of the Virginia Governors Award for Fire Service Excellence, Virginia Fire Chiefs President’s Award, International Association of Fire Chiefs President’s Award, and Fire Chief Magazine 2008 Career Fire Chief of the Year.