July 8, 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 Proposed Solution to GPS Interference

Dear Ms. Dortch,

I am writing today on behalf of the Iowa Corn Growers Association (ICGA) and our 6,000 members regarding LightSquared’s recently proposed solution to the Global Positioning Satellite (GPS) interference issue. Although LightSquared plans to cut base station power and use the lower end of the wave spectrum, an interruption by the LTC network to the GPS service is very possible. It has been estimated the cost to U.S. farmers could range from $15 to $30 billion annually. Therefore, LightSquared’s proposal will not completely resolve the issue at hand. ICGA is extremely concerned by the possible interference as it would degrade the GPS system’s accuracy and reliability. GPS usage is essential to farmers nationwide, and the interference caused by the company’s services would also 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. 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. Failure to protect high-precision GPS services would adversely impact fertilizer and pesticide efficiencies, yield and variable rate applications. Ultimately, farm operations would have to absorb higher seed, fertilizer, fuel and wage costs.

Increasing adoption of GPS based technology continues as the value becomes more apparent every year. The tractors, combines and applicators equipped with these systems will not function properly if their signals are overpowered by LightSquared’s network. Without dependable GPS signals, the machines and services are ineffective.
ICGA 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 such a valuable business sector. As millions of American jobs depend on GPS technology, implementation of LightSquared’s plan will negatively affect the U.S. economy.

LightSquared has yet again changed their proposal due to proven frequency interference, and we believe a defined system, already in place, should be preserved for current industrial and consumer purposes without any threat of interference.

In light of the above concerns and recent findings, ICGA requests the FCC to take immediate action to prevent LightSquared from operating base stations or expanding its network; the company should not be allowed to use the same frequency as GPS if there is a possibility of signal interference.

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

Sincerely,

Dean Taylor
ICGA President