January 4, 2012

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

Re: LightSquared Subsidiary, LLC
Ex Parte Communication. IB Docket No. 11-109
IBSF File No. SAT-MOD-20101118-00239

To Whom It May Concern:

My firm uses high-precision GPS receivers to provide its clients with high-precision positioning services. Although our client base includes many commercial entities, our most demanding high-precision projects are performed for public agencies, including local, state and federal. These large-scale projects, many of which are used in applications such as flood plain mapping, would not be economically feasible without 24/7 access to the faint signals from the DOD GPS constellation. The LightSquared proposal threatens that access.

High-precision GPS for commercial users was first introduced over 20 years ago. Its reliance on wide-band reception, some of which lies slightly outside the allocated frequencies, was born of technical necessity in the early days of the technology. This out-of-band usage has caused no trouble and has continued uncontested for two decades. During that time many applications, many of which are safety-of-life uses, have come to rely upon this condition. The LightSquared proposal to repurpose space-based frequencies to terrestrial uses, along with the attendant magnitude increase in expected power levels, would render many of those applications infeasible without enormously costly hardware, software and user-training upgrades. LightSquared’s suggestions for mitigation measures are unrealistic and unproven for mass implementation.

The installed base of high-precision GPS receivers is huge, its users legion and its applications critical. There is no reasonable basis for allowing the LightSquared proposal to move forward and disrupt these important services. I urge you to reject the LightSquared application and maintain its space-based frequencies for space-based applications.

Sincerely,

Jim Frame