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

Dear Secretary Dortch,

As Manager of the Land and Aerial Survey Office within the Indiana Department of Transportation (INDOT) I have significant concerns with LightSquared Subsidiary, LLC recent request to affirm its license and its request to go forward with its plan. My concerns are based on the Technical Working Groups prior testing which verified that the network would cause devastating interference to all kinds of GPS receivers. In addition to the more recent Government test conducted at the direction of the FCC and NTIA and reported on last month which again confirmed the depth and breadth of the serious GPS interference problems raised by LightSquared’s proposed plans, even after several revisions LightSquared claimed had ‘solved’ the interference problem.

Representing all high precision GPS receiver users within INDOT, in addition to the users of the Indiana Statewide GPS-GNSS Real Time Network, known as InCORS, of which my office maintains and administers, I feel obligated to express my opinion that this plan should not be allowed to move forward until it is clearly shown not to interfere with high precision GPS. High precision GPS surveying and the many other applications provided by its technology have become an integral part of how we as an agency, as well as hundreds of private businesses across the state, provide efficient and cost effective services.

INDOT has made a significant investment in constructing and implementing the InCORS Network as a means to reduce costs and increase efficiencies in our day to day operations in order to better serve the citizens of Indiana. The network, which currently has over 1100 registered users, including a significant portion of users in the agricultural and construction community utilizing high accuracy GPS navigation, in addition to engineering, construction and GIS users, has been established as a critical resource to the state. Any degradation in the GPS signals to receivers caused by the implementation of the LightSquared proposal, as evidenced by testing to still occur, would result in unreliable or complete jamming of the GPS signal reception and have a detrimental effect on the functional capability of our network, and for that matter, any use of GPS. As a result, the economic impact to the state would be significant just as we enter a critical time of recovery.
I urge you to thoroughly examine any and all potential implications which your decision regarding LightSquared’s plan will have on our fragile national economy, not to mention the impact to state agencies and private businesses. Although it may be determined that new equipment may reduce interference to high-precision GPS devices, do not ignore the massive retrofit and/or replacement effort that would be required, costing billions of dollars across government and private industry.

I appreciate your attention and consideration of these concerns.

Sincerely,

[Signature]

Eric N. Banschbach, PLS
Manager, Land & Aerial Survey Office
Indiana Department of Transportation