I am strongly opposed to the issuance of approval for any transmissions that may compromise the GPS system.

LightSquared's proposed operations and GPS are shown to be fundamentally incompatible. The FCC must continue to prohibit any transmissions that may impact the reliability of presently used GPS equipment. Proposed interference "solutions" that rely on receiver modifications must not be allowed.

I am a U.S. Coast Guard licensed mariner presently serving as a tugboat captain on inland and coastal waters around San Francisco Bay. I utilize GPS technology continuously in my profession to aid me in making critical navigation decisions. I am in continual contact with other mariners also utilizing GPS to provide rapid and precise position information.

Widespread use of GPS devices has greatly improved the safety environment for all mariners, professional and recreational mutually. Rapid evaluation of collision, allision, and grounding risk has greatly improved the safety of the public. GPS systems allow all mariners to quickly ascertain an accurate position. That position data not only aids the individual mariner in keeping their own vessel in safe waters, but equally critical it allows that information to be communicated to other vessels. People, property, and the environment would all suffer an immediate and highly significant increase of catastrophic risk should SPS systems be compromised.

Proposed interference "solutions" that rely on receiver modifications are not practical as many hundred thousands, and likely millions of recreational mariners will be resistant to replacing or retrofitting GPS devices presently in use. These "million rouge vessels" operating with compromised navigation equipment will have the potential to create chaos on the waterways.

Resolution of interference has to be the obligation of LightSquared, not the extensive GPS user community of millions of citizens. LightSquared must bear the costs of preventing interference emanating from their devices, and if there is no way to prevent interference, it should not be permitted to operate. GPS users or providers should not have to bear any of the consequences of LightSquared's actions.

This is a matter of critical national interest. There must be a reasonable opportunity for public comment of at least 45 days on the report produced by the working group and further FCC actions on the LightSquared modification order should take place with the approval of a majority of the commissioners, not at the bureau level.

I commend the FCC for considering new technologies to expand wireless broadband service, however any systems that threaten such critical infrastructure tools as GPS must be rejected.

Thank you for your consideration,
Scott E. Adams
Master of Towing Vessels on Near Coastal Waters
San Francisco, CA

15 February 2012