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Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

Re: Ex Parte Presentation of the U.S. GPS Industry Council in
File No. SAT-MOD-20101118-00239 and IB Docket No. 11-109

Dear Ms. Dortch:

The U.S. GPS Industry Council (“USGIC”) submits these brief comments in response to the September 7, 2012 letter from Javad Ashjaee, Ph.D., Chief Executive Officer of Javad GNSS, to Julius Genachowski, Chairman, FCC, and Lawrence Strickling, Assistant Secretary for Communications and Information, NTIA, and submitted to the record of the above referenced proceedings (the “Javad Letter”).

The Javad Letter suffers from a number of serious deficiencies, including the following:

1. The “solution” put forth in the letter ignores the installed base of millions of general location/navigation, high-precision, aviation and other GPS devices, all of which will suffer interference in the presence of LightSquared’s proposed system.

2. The insertion loss of the filter (estimated from Dr. Ashjaee’s earlier filings to be 3 dB) exceeds the entire front-end noise figure of most modern GPS receivers. This level of insertion loss would exceed the internationally recognized 1 dB C/N0 degradation standard.

3. The filter does not protect the entire RNSS band. Rather, it rolls off steeply before the 1559 MHz band edge, effectively eliminating about 5 MHz from the RNSS band.

4. Critical technical parameters for this filter, such as response over temperature, manufacturing tolerance, phase response, and size, all of which are typically degraded as filter response becomes steeper, are omitted from the letter.
USGIC submits that these deficiencies alone are sufficient to warrant the Commission’s disregard of the submission. If further clarification is needed, however, USGIC would be willing to submit a more extensive analysis.

Respectfully submitted,

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Executive Director  
U.S. GPS Industry Council  
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cc: The Honorable Julius Genachowski  
The Honorable Lawrence Strickling