



October 26, 2011

FILED ELECTRONICALLY

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

Re: IB Docket No. 08-184 and FCC File No. SAT-MOD-20101118-00239
Ex Parte

Dear Ms. Dortch:

On October 25, Representative Greg Walden, Chairman of the House Energy & Commerce Committee, Subcommittee on Communication & Technology, invited representatives of LightSquared, Trimble, John Deere and Garmin to discuss the technology and legal issues relating to GPS receiver sensitivity to LightSquared's authorized operations in the L-band. Chairman Walden also invited representatives of the FCC, and Austin Schlick of the Office of the General Counsel, Julius Knapp of the Office of Engineering & Technology, and Greg Guice of the Office of Legislative Affairs attended. Other attendees were as follows:

LightSquared

Jeff Carlisle, Geoff Stearn, Michael Tseytlin, Mark Paoletta of Dickstein Shapiro and Amy Mehlman of Mehlman Capitol Strategies

GPS Manufacturers

Trimble: Jim Kirkland, Paul Scolese of Akin, Gump
Garmin: Scott Burgett, Anne Swanson of Dow Lohnes
Deere: John Rauber, Catherine Wang of Bingham McCutchen, Tim Bransford of Bingham McCutchen

Chairman Walden and Staff

Representative Greg Walden, Ray Baum, Neil Fried, David Redl, Nick Degani, Kelsey Guyselman

The following issues were discussed in the meeting:

- Technical issues remaining around susceptibility of precision receivers under LightSquared's current proposals: Specifically, LightSquared explained that precision manufacturers designing MSS-augmented receivers could have chosen to have open

receivers that look all the way across the L-band, or they could have chosen to have a separate front end that was filtered to only receive the 2.5 Khz necessary for the augmentation signal, which could then be tuned across the L-band and would have avoided the current issues with receiver overload. GPS manufacturers chose the first option, which was cheaper for the manufacturers. Had they selected the second option, the ATC and MSS augmentation signals could co-exist in the L-band with adequate separation. During this discussion, LightSquared distributed the attached document, which is an excerpt of a John Deere ex parte.

- Continuing concern of the GPS industry on ultimate disposition of the upper 10 MHz of L-band spectrum closest to GPS: Trimble General Counsel Jim Kirkland stated that what the GPS industry is looking for is resolution of the upper 10 MHz and a determination of how much it will cost for replacement of susceptible receivers.
- Nature of the legal rights claimed by the GPS manufacturers to protection from interference: This discussion compared the GPS manufacturers' regulatory right to be free from interference into the GPS band, as opposed to their absence of such a right outside of the GPS band, leaving only contractual rights when purchasing MSS augmentation services in the L-band. LightSquared's position was that the only out-of-band rights of the GPS manufacturers, if any, would be contractual.
- In response to Mr. Kirkland raising concerns about the military's use of GPS, LightSquared responded that it shared those concerns about susceptible GPS devices sold to the Department of Defense, and pointed out that the FCC's 2003, 2004, 2005 and 2010 decisions on ATC were reviewed by the Department of Defense through the NTIA's IRAC process.

Respectfully submitted,

/s/Jeffrey Carlisle
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Regulatory Affairs & Public Policy

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High Precision and Augmented Receivers

All modern high precision receivers are wideband and use filters that cover GPS + GLONASS bands, and if Augmented, MSS also

All Deere receivers are High Precision and Augmented

- So are many from Trimble, NovAtel, Hemisphere, Leica, etc.

Other High Precision receivers are not Augmented

