

July 21, 2011

Via Hand Delivery

Mr. James Burtle
Chief, Experimental Licensing Branch
Office of Engineering and Technology
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

**Re: OSU-University Multispectral Laboratories, LLC
File No. 0289-EX-PL-2011**

Dear Mr. Burtle:

The above-referenced application by OSU-University Multispectral Laboratories, LLC ("Applicant") seeks experimental authority for a five-year period to conduct outdoor field tests in the 1525-1559 MHz and 1615-1665 MHz frequency bands. These bands include L-band frequencies (1525-1544/1545-1559 MHz (downlink) and 1626.5-1645.5/1646.5-1660.5 MHz (uplink)) authorized for and operationally in use by LightSquared Subsidiary LLC ("LightSquared") and ISAT US Inc. ("Inmarsat"). LightSquared is the licensee of AMSC-1 (a.k.a. MSAT-2) and SkyTerra 1, in-orbit satellites licensed by the Commission to provide Mobile Satellite Service ("MSS"), and provides critical communications services to public safety users in the L-band frequencies.¹ Inmarsat is authorized by the Commission to operate seven satellites across the geostationary arc to provide MSS services to critical customers including the United States Government, public safety users and major media organizations in L-band frequencies internationally coordinated with LightSquared and other MSS providers.²

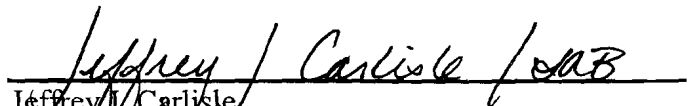
Based on a review of the application and discussions with the Applicant, LightSquared believes that the proposed experimental operations present a significant risk of harmful interference to LightSquared's next-generation services provided via SkyTerra-1. LightSquared understands that the mobile handsets to be used for the testing will transmit in LightSquared's uplink band using 1.3 Watts over a 100 kHz bandwidth, effectively providing an uplink power density similar to handsets that will be used by end-user customers obtaining next-generation services via SkyTerra-1. The Applicant's handsets will not have a defined duty cycle for the transmissions or for the dwell time on any particular frequency. Further, nothing in the application indicates that the Applicant will take measures to mitigate harmful interference to authorized L-band users. Inmarsat shares LightSquared's concerns.

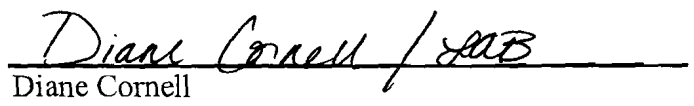
¹ LightSquared is also authorized to deploy an Ancillary Terrestrial Component in the L band.

² Inmarsat's satellites are listed on the FCC International Bureau's website (available at <http://transition.fcc.gov/ib/sd/se/isat.html>).

For these reasons, LightSquared and Inmarsat request that prior to taking any action the OET require the Applicant to provide additional information demonstrating that the proposed testing will not cause harmful interference to LightSquared or Inmarsat's operations. Alternatively, the OET should condition any grant of the application with a limit on the composite EIRP density in the uplink L-band frequencies of less than -30 dBW/4 kHz within 6° north or south of the geostationary arc. Moreover, if the Applicant's transmissions cause harmful interference, the Applicant must immediately cease such transmissions, as required by the Commission's rules. *See* 47 C.F.R. § 5.85(c) (grant of all experimental authorizations conditioned on not causing any harmful interference); 47 C.F.R. § 5.111(a)(2) (licensee must cease transmissions if harmful interference to an established radio service develops). In this regard, the OET should require that the Applicant notify LightSquared and Inmarsat prior to commencing experimental operations and provide LightSquared and Inmarsat with a point of contact.

Please contact the undersigned with any questions.


Jeffrey J. Carlisle
Executive Vice President, Regulatory Affairs and
Public Policy, LightSquared Subsidiary LLC


Diane Cornell
Vice President, Government Affairs, Inmarsat Inc.

CERTIFICATE OF SERVICE

I, Cherie L. Mills, hereby certify that on this 21st day of July 2011, I served a true copy of the foregoing by first-class United States mail, postage prepaid, upon the following:

James Burtle*
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Federal Communications Commission
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Anthony Serafini*
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* By hand delivery



Cherie L. Mills