

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	IBFS File No. SAT-AMD-20180531-00044
LIGADO NETWORKS LLC)	IBFS File No. SAT-AMD-20180531-00045
)	IBFS File No. SES-AMD-20180531-00856
Amendment to Modification Applications)	

COMMENTS OF INMARSAT INC.

Inmarsat Inc. (“Inmarsat”) hereby files these comments in support of the above-referenced applications of Ligado Networks LLC (“Ligado”) to amend its applications to modify the ancillary terrestrial component (“ATC”) of its L-Band mobile satellite service networks (the “Amendment Applications”). Inmarsat supports grant of Ligado’s applications as amended.

Inmarsat is keenly interested in this proceeding. It employs L-Band spectrum to provide critical services and capabilities to users in the maritime, aviation, military, public safety, media, energy, and other sectors. Inmarsat and Ligado have negotiated an inter-operator Cooperation Agreement that paves the way for Ligado to develop its L-Band ATC network while allowing Inmarsat to continue providing services and innovating in the L-Band.

Ligado’s amendments to its pending License Modification Applications reflect a further effort by the company to accommodate its spectrum neighbors and protect government operations. Ligado’s earlier proposals to reduce its power levels on the Uplink Bands were necessary to accommodate the interests of affected parties, and Inmarsat filed in support of those applications.¹ After extensive analysis and consultation with various stakeholders, the U.S. Department of Transportation determined that an EIRP limit of 9.8 dBW (10 Watts) for Ligado’s

¹ See Reply Comments of Inmarsat, IB Docket Nos. 11-109, 12-340 (filed June 21, 2016).

ATC operations in the 1526-1536 MHz band will protect the aviation community from any harmful interference from Ligado's proposed operations.² Inmarsat respectfully recommends the Commission take into consideration the DOT's analysis on this question and approve the License Modification Applications with the amended 9.8 dBW (10 Watts) EIRP limit for Ligado's lower downlink spectrum.

Throughout this process, Ligado has collaborated with the interested parties and made substantial modifications to its proposal to accommodate the legitimate concerns of the GPS community, Inmarsat, and others. This issue is now ripe for decision, and the Commission should act promptly on Ligado's Modification Applications.

Respectfully submitted,

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² See U.S. Department of Transportation, "Global Positioning System (GPS) Adjacent Band Compatibility Assessment," Final Report, at 153 (April 2018), available at <https://www.transportation.gov/sites/dot.gov/files/docs/subdoc/186/dot-gps-adjacent-band-finalreportapril2018.pdf>.