



July 6, 2018

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, D.C. 20554

Re: Amendment to License Modification Applications  
IB Docket No. 11-109; IBFS File Nos. SES-MOD-20151231-00981, SAT-  
MOD-20151231-00090, and SAT-MOD-20151231-00091

Dear Ms. Dortch:

TeleWorld Solutions writes to express its support for granting the License Modification Application that Ligado Networks filed in December 2015 and amended on May 31, 2018. As a cutting-edge wireless solutions provider and integrator, we are deeply familiar with the existing wireless ecosystem and understand the pressing gaps confronting our country. The terrestrial operations Ligado plans to launch — as explained in its License Modification Applications and the recent Amendment — can help fill in those gaps and propel progress toward 5G deployment.

For nearly a decade, TeleWorld Solutions has catered to the full life cycle of wireless technology — including consulting on design, dimensioning, testing, optimization, and deployment. We offer innovative tools, techniques, and processes to develop and implement creative solutions for our wireless clients. By leveraging our hands-on experience from hundreds of thousands of successful wireless implementations, we have developed specialized knowledge of how legacy and modern network components intersect and interact.

A reality we confront in nearly all the work we do is the growing need for spectrum, especially spectrum that can support 5G, the next generation of wireless technology. We have also seen firsthand the growing demand for new wireless services. Additional spectrum that is dedicated to wireless use can fulfill these needs, enable the development of those new services, and open the doors to further innovation in the wireless space.

Ligado's proposed terrestrial operations offer a concrete way to help address these needs. Granting the License Modifications as amended would maximize the potential of the



prime mid-band spectrum for which Ligado holds licenses. This type of “green-field” spectrum is exactly the sort of spectrum that can expedite the deployment of new wireless services, including in particular, 5G. Importantly, optimizing this spectrum would help not just a single company but players across the wireless ecosystem, which could benefit from the new opportunities Ligado’s broadband deployment would generate.

Accordingly, we respectfully urge the Commission to grant the Amendment and underlying License Modifications to support the growth of promising and beneficial wireless technologies and help position the United States as a leader in 5G.

Respectfully submitted,

A large, stylized handwritten signature in black ink, consisting of several overlapping loops and a long vertical stroke on the right side.

Shervin Gerami

Chief Executive Officer