



August 14, 2015

**Electronically Filed Via ECFS and IBFS**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: Written *Ex Parte* Communication**

**IB Docket No. 12-340; IBFS File Nos. SAT-MOD-20101118-00239, SAT-MOD-20120928-00160, SAT-MOD-20120928-00161, SES-MOD-20121001-00872**

Dear Ms. Dortch:

On July 15, 2015, Roberson and Associates (“Roberson”), a consultant to LightSquared, submitted information through LightSquared’s counsel regarding a “test plan” that it believes will address the compatibility of terrestrial broadband and Global Positioning System (“GPS”) receivers.<sup>1/</sup> LightSquared’s letter asserts that it previously sought input on its test plan from interested parties, but that it was nonetheless renewing its request so that it could “receive feedback within the next week, since testing is anticipated to begin by the end of this month.”<sup>2/</sup> While LightSquared is free to submit any technical information to the Commission, the GPS Innovation Alliance (“GPSIA”) does not support duplicative testing and wishes to make clear that it will focus its technical efforts on the government assessment of adjacent-band compatibility issues that is currently being conducted by the Department of Transportation (“DoT”). If and when LightSquared submits technical analyses for the record, GPSIA will comment at that time.

GPSIA recognizes that, because of spectrum scarcity, the Commission and the National Telecommunications and Information Administration (“NTIA”) must consider how to use all spectrum most productively. As part of those efforts, the DoT has initiated an Adjacent Band

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<sup>1/</sup> See Letter from Gerard J. Waldron, Counsel to LightSquared, Covington & Burling LLP, to Ms. Marlene H. Dortch, Secretary, FCC, IB Docket No. 12-340; IBFS File Nos. SAT-MOD-20101118-00239; SAT-MOD-20120928-00160; SAT-MOD-20120928-00161; SES-MOD-20121001-00872 (filed July 15, 2015).

<sup>2/</sup> *Id.* at 1.

Compatibility study and is expected to release a draft test plan as part of its study shortly.<sup>3/</sup> It is GPSIA's understanding that federal stakeholders – including NTIA, the Department of Defense and the Commission – have provided DoT with feedback on the proposed test plan. When DoT publishes the test plan in the Federal Register, all interested parties – federal and non-federal entities – will have a further and complete opportunity to provide feedback so that DoT is fully informed about how tests should be conducted. Indeed, DoT has already conducted several workshops on this topic and stakeholders – including LightSquared – have actively participated in those workshops.<sup>4/</sup>

Aside from being duplicative, it is evident that the testing proposed by LightSquared would reinvent any number of test methods and acceptance criteria. For example, the LightSquared test plan focuses on a unilateral sampling of key performance indicators (“KPIs”) of questionable relevance. Many of the performance requirements for GPS devices are internationally agreed upon by the International Telecommunications Union, the International Civil Aviation Authority, and other world standards bodies. GPSIA continues to maintain that a proceeding such as this, focused on one service provider, is not an appropriate place for domestic modification of established international standards that would have repercussions not just within our borders but for numerous cross-border applications, such as aviation. In any case, GPSIA expects that the methodology for analysis of potential interference and the criteria for determination of harmful interference will be central issues in the DoT compatibility assessment, and GPSIA will provide substantive comments on these issues as part of that proceeding.

GPSIA looks forward to continuing to cooperate with all stakeholders in an open, transparent and collaborative process to further assess the impact of adjacent-band operations on GPS systems.

If there are any questions, please contact the undersigned.

Sincerely,



James A. Kirkland  
President

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<sup>3/</sup> See U.S. Dep't of Transp., *GPS Adjacent-Band Compatibility Assessment Plan* (Dec. 2012), available at [http://ntl.bts.gov/lib/52000/52500/52560/GPS\\_Adjacent\\_Band\\_Compatibility\\_Assessment\\_Final\\_Dec\\_2012.pdf](http://ntl.bts.gov/lib/52000/52500/52560/GPS_Adjacent_Band_Compatibility_Assessment_Final_Dec_2012.pdf).

<sup>4/</sup> See GPS.gov, *GPS Adjacent-Band Compatibility Assessment*, <http://www.gps.gov/spectrum/ABC/> (last visited Aug. 6, 2015).