

Washington, DC

EX PARTE OR LATE FILED

RAUL R. RODRIGUEZ 202.416.6760 RRODRIGUEZ@LERMANSENTER.COM

January 7, 2011

By Hand Delivery

Marlene H. Dortch Secretary Federal Communications Commission 445 Twelfth Street, S.W. Washington, DC 20554 FILED/ACCEPTED

JAN - 7 2011

Federal Communications Commission Office of the Secretary

Re: Notice of *Ex Parte* Presentation in LightSquared Subsidiary LLC Application for Modification of Authority for Ancillary Terrestrial Component, File No. SAT-MOD-20101118-00239

Dear Ms. Dortch:

This letter serves notice that on January 7, 2011, I discussed with Dr. Julius Knapp, Chief of the Office of Engineering and Technology, the attached recommended approach for undertaking an analysis of the potential interference to receiver equipment operating with the Global Positioning System resulting from the proposal of LightSquared Subsidiary LLC embodied in the referenced application. The attached recommended approach, submitted by the U.S. GPS Industry Council, responds to questions posed to its members at a meeting with Commission representatives on January 6, 2011.

Respectfully submitted,

/s/ Raul R. Rodriguez

Raul R. Rodriguez

Counsel for the U.S. GPS Industry Council

Attachment

cc: Dr. Julius Knapp (by email)

The U.S. GPS Industry Council proposes that:

- 1. Based on the 2002 precedent established by NTIA/IRAC resulting in the joint industry agreement to protect GPS, NTIA/IRAC to be asked to conduct an analysis including industry and government technical experts to examine the potential for interference using public and private sector operating scenarios within a reasonable timeframe (not to exceed 90 days).
- 2. In consultation with all affected parties, including technical experts from the US GPS Industry Council member companies and LightSquared, participate in a review of NTIA/IRAC methodology and work program, including contributing technical analysis and ensuring that the operational use scenarios are realistic and well represented.
- 3. Non-proprietary data on receiver sensitivity to overloading will be made available from several of the US GPS Industry Council member companies. Test conditions under which the data were taken will be stated with the data.
- 4. The analysis process should include appropriate means for public input and comment.
- 5. Final action on the LightSquared waiver application will be deferred until the NTIA analysis is completed and transmitted to the Commission.