ORIGINAL

LERMAN SENTER PLLC

WASHINGTON, DC

EX PARTE OR LATE FILED

STEPHEN D. BARUCH
202.416.6782
SBARUCH@LERMANSENTER.COM

January 21, 2011

FILED/ACCEPTED

JAN 21 2011

Federal Communications Commission
Office of the Secretary

By Hand Delivery
Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: Notice of Written *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:

On January 19, 2011, representatives of the United States GPS Industry Council ("U.S. GPS IC") and several member companies held a teleconference with officials from the Commission's Office of Engineering and Technology, International Bureau, Public Safety and Homeland Security Bureau, and Wireless Telecommunications Bureau to discuss the results of empirical experimentation conducted by Garmin International ("Garmin") to assess the impact on GPS receivers operating in the 1559-1610 MHz band of fixed, high-power terrestrial broadband transmitters of the new, non-ancillary type LightSquared Subsidiary LLC ("LightSquared") first proposed in its above-referenced November 2010 application. The LightSquared application proceeding has been designated to have permit-but-disclose status for purposes of the Commission's *ex parte* rules.

The U.S. GPS IC duly filed an *ex parte* notice of the teleconference on January 20, 2011, and provided a copy of the Garmin report, entitled *Experimental Evidence of Wide Area GPS Jamming That Will Result from LightSquared's Proposal to Convert Portions of L Band 1 to High Power Terrestrial Broadband,* that was discussed during the meeting. On January 21, 2011, the U.S. GPS IC made the attached written *ex parte* presentation to provide several pieces of information that Commission personnel requested during the January 19, 2011 teleconference.

In accordance with Section 1.1206 of the Commission's Rules, 47 C.F.R. § 1.1206, two copies of this letter and its enclosure are provided for inclusion in the Commission's files.

Please direct any questions to me.

Respectfully submitted,

Stephen D. Baruch
Counsel for the United States GPS Industry Council

Enclosure

cc: (w/Enclosure): Julius Knapp, Chief, OET
Ronald Repasi
Michael Ha
Mark Settle
Robert Weller
Robert Nelson
Sankar Persaud
Pat Amodio
Paul Murray
Tom Peters

United States
GPS Industry Council

January 21, 2011

Mr. Julius Knapp
Chief
Office of Engineering and Technology
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: Additional Information from U.S. GPS Industry Council in Response to Questions Posed During January 19, 2011 Teleconference

Dear Mr. Knapp:

During the January 19, 2011 teleconference representatives of the United States GPS Industry Council ("U.S. GPS IC") and several member companies had with officials from your Office, along with the Commission's International Bureau, Public Safety and Homeland Security Bureau, and Wireless Telecommunications Bureau to discuss the results of empirical experimentation conducted by Garmin International ("Garmin") to assess the impact on GPS receivers operating in the 1559-1610 MHz band of fixed, high-power terrestrial broadband transmitters of the new, non-ancillary type LightSquared Subsidiary LLC ("LightSquared") first proposed in its above-referenced November 2010 application, the U.S. GPS IC was asked to provide some additional information. We now provide the materials described below.

Appendix 1 to this letter contains the notch filter response information requested during the teleconference.

Appendices 2a and 2b to this letter contain the out-of-band characteristics of the LightSquared transmitter simulator used in the study presented in the Garmin report. The unmodulated carrier is presented in the figure in Appendix 2a, and the modulated signal is given by the figure in Appendix 2b. Please note that the high noise floor is explained by the fact that the laboratory where the study was done was not equipped with a tracking filter that could extend the spectrum analyzer's dynamic range.

2000 K Street, NW • Suite 600 • Washington, DC 20006-1809
Tel. (202) 416-6282

Finally, the characteristics of the GPS front end used in the Garmin nüvi 265W receiver analyzed in the Garmin report are available for download at the following locations on the component manufacturer's web site:

http://www.infineon.com/dgdl/BGM781N11.pdf?folderId=db3a30431f848401011fcbf2ab4c04c4&fileId=db3a304325afd6e001261d7b53dd601e

http://www.infineon.com/dgdl/AN184.pdf?folderId=db3a304313b8b5a60113d4239297042f&fileId=db3a304326c2768b0126dc49af342f1f

To the extent that you, your staff, or any of the Commission personnel on Wednesday's call have any questions regarding this material, please direct those questions to me and I will coordinate any further response.

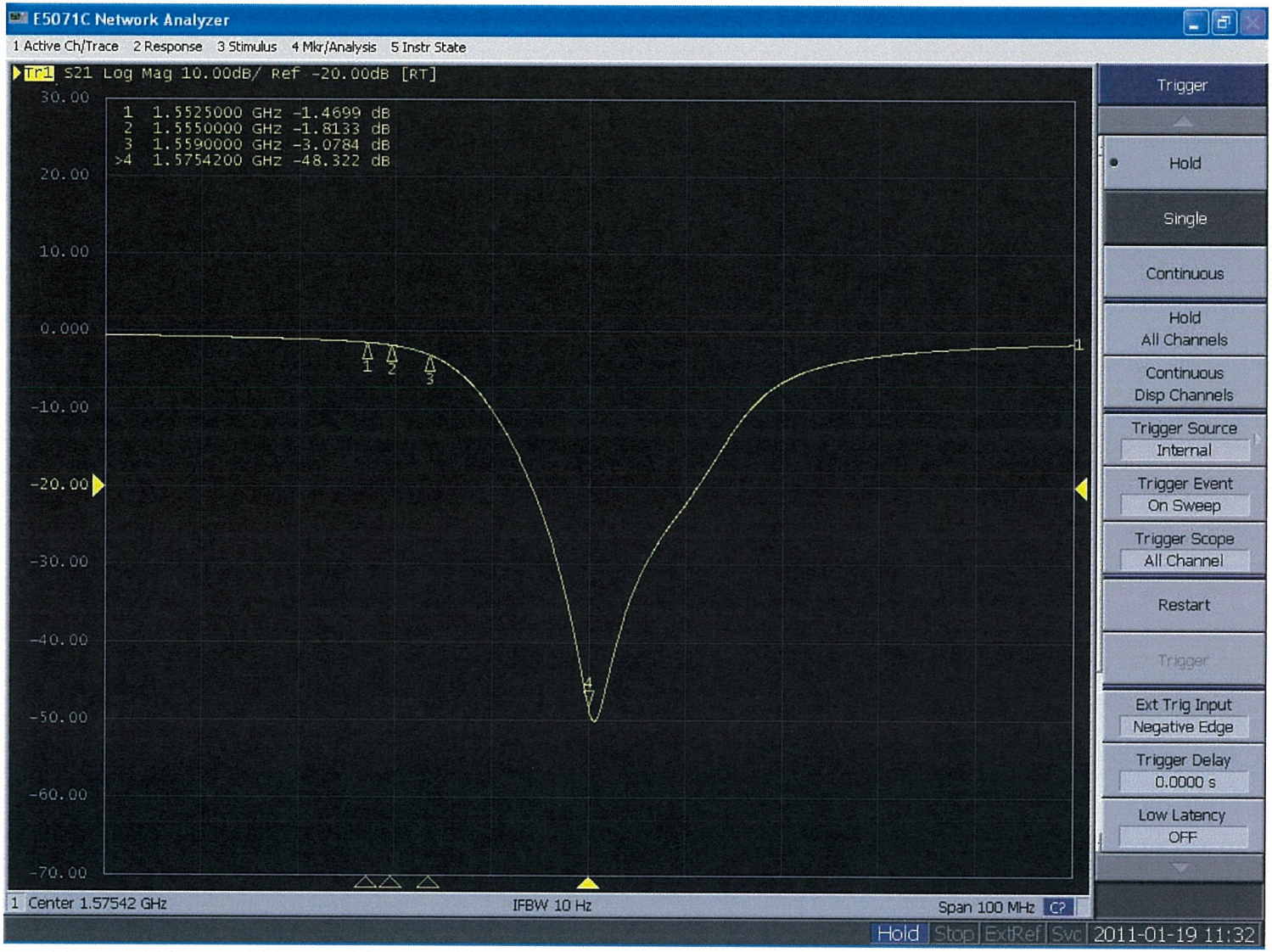
Respectfully submitted,

F. Michael Swiek
Executive Director

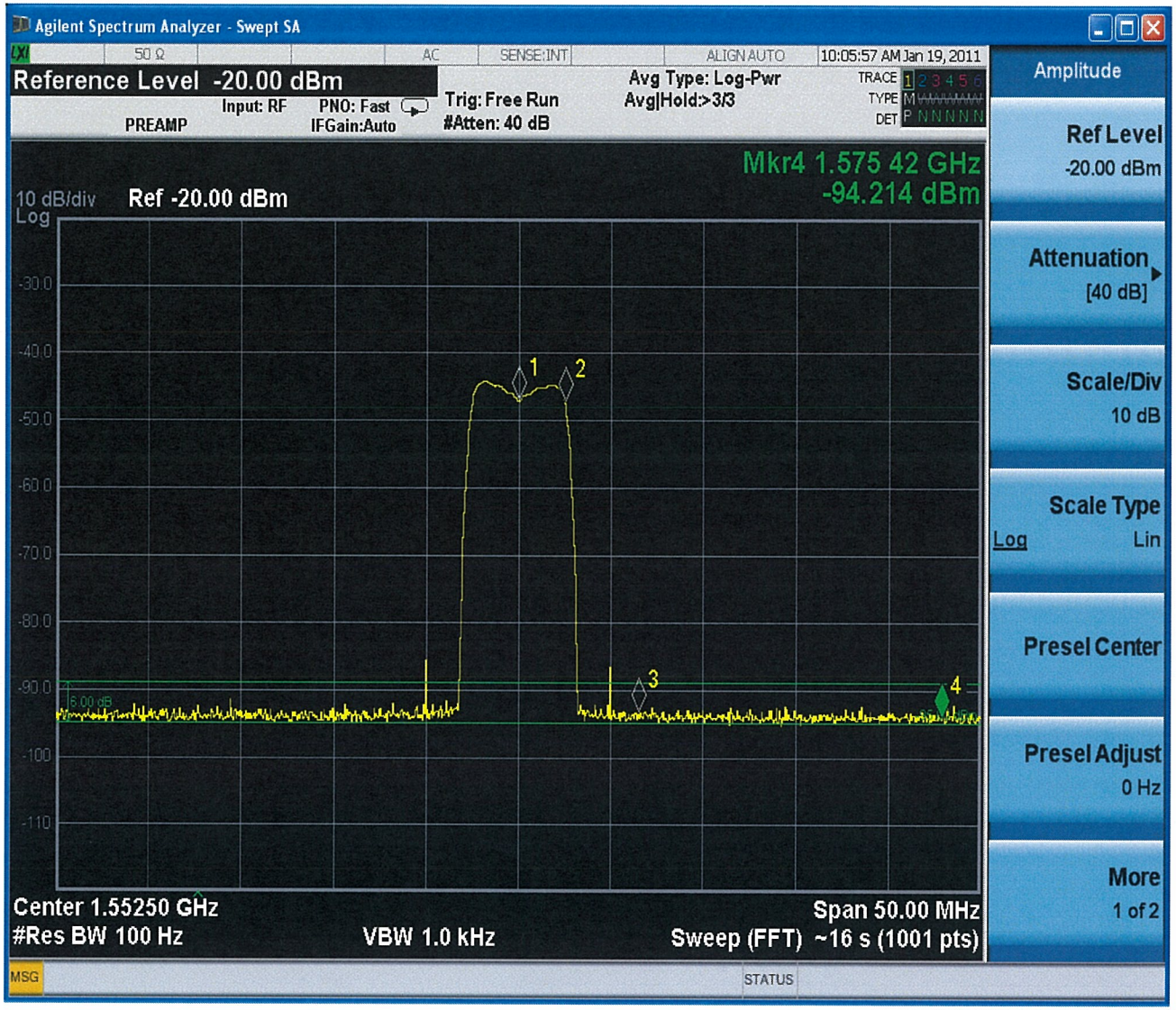
Enclosures

cc: (w/ enclosures): Julius Knapp, Chief, OET
Ronald Repasi
Michael Ha
Mark Settle
Robert Weller
Robert Nelson
Sankar Persaud
Pat Amodio
Paul Murray
Tom Peters

APPENDIX 1


E5071C Network Analyzer
1 Active Ch/Trace 2 Response 3 Stimulus 4 Mkr/Analysis 5 Instr State
Tr1 S21 Log Mag 10.00dB/ Ref -20.00dB [RT]
1 1.5525000 GHz -1.4699 dB
2 1.5550000 GHz -1.8133 dB
3 1.5590000 GHz -3.0784 dB
>4 1.5754200 GHz -48.322 dB
30.00
20.00
10.00
0.000
-10.00
-20.00
-30.00
-40.00
-50.00
-60.00
-70.00
1 Center 1.57542 GHz
IFBW 10 Hz
Span 100 MHz
Trigger
Hold
Single
Continuous
Hold All Channels
Continuous Disp Channels
Trigger Source Internal
Trigger Event On Sweep
Trigger Scope All Channel
Restart
Trigger
Ext Trig Input Negative Edge
Trigger Delay 0.0000 s
Low Latency OFF
Hold Stop ExtRef Svc 2011-01-19 11:32


Agilent Spectrum Analyzer - Swept SA
50 Ω
AC
SENSE:INT
ALIGN AUTO
10:16:53 AM Jan 19, 2011
Reference Level 0.00 dBm
PREAMP
Input: RF
PNO: Fast
IFGain:Auto
Trig: Free Run
#Atten: 40 dB
Avg Type: Log-Pwr
Avg|Hold: 3/3
TRACE 1 2 3 4 5 6
TYPE M
DET P N N N N N
Mkr4 1.575 42 GHz
-94.472 dBm
10 dB/div
Log
Ref 0.00 dBm
-10.0
-20.0
-30.0
-40.0
-50.0
-60.0
-70.0
-80.0
-90.0
6.00 dB
Center 1.55250 GHz
#Res BW 100 Hz
VBW 1.0 kHz
Span 50.00 MHz
Sweep (FFT) ~16 s (1001 pts)
MSG
STATUS
Trace/Det
Select Trace
Trace 1
Clear Write
Trace Average
Max Hold
Min Hold
View/Blank
Trace On
More
1 of 3


Agilent Spectrum Analyzer - Swept SA
50 Ω
AC
SENSE:INT
ALIGN AUTO
10:05:57 AM Jan 19, 2011
Reference Level -20.00 dBm
PREAMP
Input: RF
PNO: Fast
IFGain:Auto
Trig: Free Run
#Atten: 40 dB
Avg Type: Log-Pwr
Avg|Hold:>3/3
TRACE 1 2 3 4 5 6
TYPE M
DET P N N N N N
Mkr4 1.575 42 GHz
-94.214 dBm
10 dB/div
Log
Ref -20.00 dBm
-30.0
-40.0
-50.0
-60.0
-70.0
-80.0
-90.0
-100
-110
1
2
3
4
6.00 dB
Center 1.55250 GHz
#Res BW 100 Hz
VBW 1.0 kHz
Span 50.00 MHz
Sweep (FFT) ~16 s (1001 pts)
Amplitude
Ref Level
-20.00 dBm
Attenuation
[40 dB]
Scale/Div
10 dB
Scale Type
Log
Lin
Presel Center
Presel Adjust
0 Hz
More
1 of 2
MSG
STATUS