



UNIVERSITIES SPACE RESEARCH ASSOCIATION

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Jan 20, 2011

The Honorable Julius Genachowski
Chairman
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Received & Inspected

JAN 25 2011
FCC Mail Room

Subject: LightSquared Application Request for Modification of Its Authority for Ancillary Terrestrial Component (ATC) (FCC File No. SAT-MOD-20101118-00239)

Dear Mr. Chairman:

The Universities Space Research Association is an association of 105 Ph.D. granting institutions in space science and aeronautics technology. I write to urge the commission to evaluate with the utmost care the above-referenced application. It creates the strong potential for harmful interference to all Global Positioning System (GPS) users ranging from advanced scientific and training applications to the development a new global aviation control system.

In particular, USRA member universities are very engaged in research on all aspect of GPS use and testing. This includes development of the impending Federal Aviation Administration's transition to a satellite based navigation system, known as NextGen. This system will result in lower carbon fuel usage, less greenhouse gas emissions and ultimately represent a significant increase in passenger safety and benefits to the nation's economy. Satellite data used by universities involving GPS tracking and geodetic networks across the United States could also be impacted. These applications range from global environmental monitoring, weather prediction, and earthquake monitoring to advanced concepts such as training for space systems engineers. All of these have the potential to be adversely effected by the LightSquared proposal unless rigorous measures are implemented to mitigate interference to the reception of GPS signals.

The Commission's evaluation of this waiver application must focus on the scientific, environmental, safety and economic effects. In light of the importance of the nature and extent of possible adverse consequences, the application should not receive expedited treatment. Instead, the commission should terminate review of this application and incorporate it within the current MSS Broadband NPRM/ROI ET Docket No. 10-142 in order to provide adequate opportunity for public comment and openly reviewed analyses.

Sincerely,

Dr. Frederick A. Tarantino
President