

4205 River Green Parkway Duluth, GA USA 30096-2563
www.agcocorp.com

(770) 813-6021



Randall G. Hoffman
Senior Vice President
Global Sales & Marketing, Product Management
randy.hoffman@agcocorp.com

FAX COVER SHEET

FILED/ACCEPTED

DATE: May 31, 2011
TO: The Honorable Julius Genachowski, Chairman
Federal Communications Commission
FAX NUMBER: (866) 418-0232
FROM: Randy Hoffman
PHONE NUMBER: (770) 813-6021

MAY 31 2011
Federal Communications Commission
Office of the Secretary

SUBJECT: *Coalition to Save Our GPS*

CC:	Senator Johnny Isakson	(202) 228-0724 and (770) 661-0768
	Senator Saxby Chambliss	(202) 224-0103 and (770) 226-8633
	Rep. Jack Kingston, District 1	(202) 226-2269 and (912) 367-7404
	Rep. Sanford D. Bishop Jr., District 2	(202) 225-2203 and (706) 320-9479
	Rep. Lynn Westmoreland, District 3	(202) 525-2515 and (770) 683-2042
	Rep. Hank C. Johnson, Jr., District 4	(202) 226-0691 and (770) 987-8721
	Rep. John Lewis, District 5	(202) 225-0351 and (404) 331-0947
	Rep. Tom Price, District 6	(202) 225-4656 and (770) 565-7570
	Rep. Robert Woodall, District 7	(202) 225-4272 and (770) 232-2909
	Rep. Austin Scott, District 8	(202) 225-3013 and (229) 396-5179
	Rep. Tom Graves, District 9	(202) 225-8272 and (706) 278-0840
	Rep. Paul C. Broun, District 10	(202) 226-0776 and (706) 447-3857
	Rep. Phil Gingrey, District 11	(202) 225-2944 and (770) 795-9551
	Rep. John Barrow, District 12	(202) 225-3377 and (706) 722-4496
	Rep. David Scott, District 13	(202) 225-4628 and (770) 210-5673

TOTAL SENT: 3 (including cover)



4205 River Green Parkway Duluth, GA USA 30096-2563
www.agcocorp.com

(770) 813-6021

Randall G. Hoffman
Senior Vice President
Global Sales & Marketing, Product Management
randy.hoffman@agcocorp.com

May 31, 2011

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

Dear Mr. Chairman:

We write to express concern about a conditional waiver that was granted by the International Bureau in January 2011 after an abbreviated public-notice process.

The exclusive waiver, for a company named LightSquared Subsidiary LLC, would waive the integrated service rule for its L-Band Mobile Satellite Service license. As a result, LightSquared would be allowed to dramatically expand the terrestrial use of satellite spectrum that neighbors Global Positioning System (GPS) spectrum. This action has serious implications for all GPS technologies, and could negatively impact millions of Americans. Unfortunately, the FCC has recklessly fast-tracked the waiver process without undertaking appropriate transparent procedures. The Commission has called on a working group to investigate and report on the potential for GPS interference by June 15. Accordingly, we request that the Commission only approve LightSquared's waiver if it can be indisputably proven that there will be no GPS interference.

LightSquared intends to build 40,000 high-powered ground transmission stations, which would transmit radio signals one billion times more powerful than GPS signals. Since the intended spectrum usage is immediately adjacent to GPS spectrum, it could lead to severe interference that effectively renders the technology useless. Such interference would have devastating effects on the United States military, emergency responders, aviation, agricultural producers, cellular telecommunications companies, homeland security, transportation, forestry, engineering and construction, land management, disaster management, natural resources, utilities, and individual consumers who rely on GPS for everyday needs.

General William Shelton, the head of the U.S. Air Force Space Command, recently said, "Within three to five miles on the ground and within twelve miles in the air, GPS is jammed by those towers... If we allow that system to be fielded and it does indeed jam GPS, think about the impact. We're hopeful we can find a solution, but physics being physics we don't see a solution right now. LightSquared has got to prove that they can operate with GPS and we're hoping the FCC does the right thing."

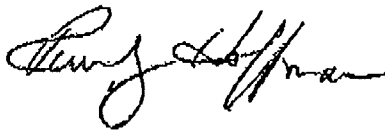
With such significant potential consequences, the FCC should have conducted in-depth studies on the consequences of reallocating the spectrum *prior* to issuing the conditional waiver. Such

an approach would have allowed for significant public comment by all stakeholders. Instead, the FCC granted the waiver with the intention of subsequently testing the effects of repurposing the spectrum. We are concerned that the brief study period arranged by the FCC following the issuance of the conditional waiver does not allow for nearly the consideration necessary for such a far-reaching decision.

Final approval should only be granted if LightSquared can indisputably demonstrate non-interference on GPS usage. We urge the full Commission to weigh in on this matter and allow for additional public comment moving forward. It is incumbent upon LightSquared to unequivocally prove that the proposal will not interfere with GPS spectrum.

We look forward to your prompt response on this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Steven Hoffmann". The signature is fluid and cursive, with the first name "Steven" written in a larger, more prominent script than the last name "Hoffmann".

cc: State of Georgia House and Senate Representatives