

151 Black Bear Ln  
State College, PA 16803

August 26, 2011

Federal Communication Commission  
Washington, DC

Dear Mr. Chairman:

As a working member of the Land Surveying profession, and as a licensed amateur radio operator, I have grave concerns with regard to recent actions taken by the commission regarding potential interference to radio spectrum allocations that have been and continue to be used by weak signal space based systems, namely Global Navigation Satellite Systems, GNSS.

The FCC must make clear, and the NTIA must ensure, that LightSquared's license modification is contingent on the outcome of the mandated study unequivocally demonstrating that there is no interference to GPS. The study must be comprehensive, objective, and based on correct assumptions about existing GPS uses rather than theoretical possibilities. Given the substantial pre-existing investment in GPS systems and infrastructure, and the critical nature of GPS applications, the results of studies must conclusively demonstrate that there is no risk of interference. If there is conflicting evidence, doubts must be resolved against the LightSquared terrestrial system. The views of LightSquared, as an interested party, are entitled to no special weight in this process.

The FCC should make clear that LightSquared and its investors are proceeding at their own risk in advance of the FCC's assessment of the working group's analysis. While this is the FCC's established policy, the Commission's International Bureau failed to make this explicit in its order.

Resolution of interference has to be the obligation of LightSquared, not the extensive GPS user community of millions of citizens. LightSquared must bear the costs of preventing interference emanating from their devices, and if there is no way to prevent interference, it should not be permitted to operate. GPS users or providers should not have to bear any of the consequences of LightSquared's actions.

Thank you for your prompt and diligent attention to this matter.

Sincerely,

Robert P Stenerson, SIT  
KR3ORY

