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Gerard J. Waldron

Covington & Burling LLP
One CityCenter
850 Tenth Street, NW
Washington, DC 20001-4956
T +1 202 662 5360
gwaldron@cov.com

May 22, 2019

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Notice of *Ex Parte* Presentation, WT Docket No. 19-116; IB Docket No. 11-109; IBFS File Nos. SES-MOD-20151231-00981, SAT-MOD-20151231-00090, and SAT-MOD-20151231-00091

Dear Ms. Dortch:

On May 20, 2019, Valerie Green, Executive Vice President and Chief Legal Officer of Ligado Networks LLC (“Ligado”), Justin Lilley of TeleMedia Policy, and the undersigned met with Aaron Goldberger, Acting Wireless Advisor to Chairman Pai. The parties discussed how the record before the Commission regarding Ligado’s pending license modification applications is complete and the Commission should proceed promptly to approve these applications which have now been pending before the Commission for more than three years.

In particular, the parties discussed Ligado’s commitment to mitigate any impact on U.S. government GPS devices, including the repair or replacement of such devices as necessary, both pre- and post-deployment. With respect to commercial use of GPS, the parties reviewed the co-existence agreements with the five major GPS device manufacturers (agreement which resulted in the development of parameters proposed in the applications), the thousands of hours of testing at NASCTN, and Ligado’s adoption of the power level recommended in the DOT Report for the lower downlink channel (1526-1536 MHz) — all of which confirm and ensure that Ligado’s terrestrial operations will not cause harmful interference to commercial GPS devices. Moreover, the record demonstrates that GPS is fully protected at 1 dB C/N₀ level in the spectrum band allocated to GPS/GNSS (1559-1610 MHz), that no parties express concerns about an impact to GPS devices from the proposed operations in the uplink bands at 1627.5-1637.5 and 1646.5-1656.5 MHz, and that, in the lower downlink, Ligado’s proposal affords GPS protection from harmful interference and creates a 23 megahertz guard band for GPS.

Furthermore, with respect to commercial use of SATCOM, the record shows that Inmarsat is developing a commercial and technical plan to address any potentially necessary

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retrofitting, and all aviation stakeholders are involved in the development and approval of this new technology.¹

Finally, with respect to claims made recently by Iridium Communications Inc. (“Iridium”),² the parties made clear that Ligado seeks to compete with Iridium for IoT customers, and that the analysis in the record establishes that Iridium’s concerns lack any engineering basis.³ This conclusion was confirmed by Iridium’s largest customer, the U.S. Department of Defense, which sponsored an analysis of this issue by Alion.⁴ We emphasized that given this evidence, it is obvious Iridium’s claims are nothing but the old Washington trick of using a regulatory process to harm a competitor. Repetition of old claims does not rebut these hard facts, and the Commission should see through this transparent attempt to game the regulatory process.

We concluded by urging the Commission to approve the license modification applications and complete the rulemaking for 1675-1680 MHz to unleash 40 megahertz of mid-band spectrum for 5G services that can truly meet the needs of industrial users and advance the Internet of Things.

Please direct any questions to the undersigned.

Sincerely,

/s/ Gerard J. Waldron
Gerard J. Waldron
Ani Gevorkian
Counsel to Ligado Networks LLC

cc: Mr. Goldberger

¹ See Reply Comments of Inmarsat Inc., IB Docket Nos. 11-109, 12-340; IBFS File Nos. SAT-AMD-20180531-00044, SAT-AMD-20180531-00045.

² See Letter from Bryan N. Tramont, Counsel, Iridium Communications Inc., to Marlene H. Dortch, Secretary, FCC, IBFS File Nos. SAT-AMD-20180531-00045, SAT-AMD-20180531-00044, SES-AMD-20180531-00856; SES-MOD-20151231-00981, SAT-MOD-20151231-00090, and SAT-MOD-20151231-00091; IB Docket Nos. 12-340, 11-109 (May 14, 2019), Attachment at 4.

³ See Letters from Gerard J. Waldron, Counsel, Ligado Networks, to Marlene H. Dortch, Secretary, FCC, IB Docket Nos. 11-109 and 12-340; IBFS File Nos. SES-MOD-20151231-00981, SAT-MOD-20151231-00090, and SAT-MOD-20151231-00091 (Jan. 16, 2017 and Nov. 2, 2016) (engineering analysis showing that Ligado’s proposed terrestrial operations will not cause harmful interference to Iridium’s operations).

⁴ Reply Comments of Ligado Networks LLC, IB Docket No. 11-109, IBFS File Nos. SAT-AMD-20180531-00044, SAT-AMD-20180531-00045, at 20-21 (July 19, 2018) (reporting on the engineering analysis conducted under the aegis of the Department of Defense which concluded Iridium’s devices will not experience harmful interference).