

# COVINGTON

BEIJING BRUSSELS LONDON LOS ANGELES  
NEW YORK SAN FRANCISCO SEOUL  
SHANGHAI SILICON VALLEY WASHINGTON

Covington & Burling LLP  
One CityCenter  
850 Tenth Street, NW  
Washington, DC 20001-4956  
T +1 202 662 6000

## Via Electronic Filing

August 18, 2015

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

**Re: IB Docket No. 12-340; IBFS File Nos. SAT-MOD-20101118-00239; SAT-MOD-20120928-00160; SAT-MOD-20120928-00161; SES-MOD-20121001-00872**

Dear Ms. Dortch:

LightSquared is filing this letter in response to an August 14, 2015, letter from the GPS Innovation Alliance (GPSIA) regarding testing of GPS devices being conducted by Roberson & Associates (Roberson). GPSIA has now made clear that despite ample opportunity to do so, it does not wish to provide useful input or help to the Roberson testing. While input from GPSIA and its members was solicited in the spirit of openness and transparency, Roberson is proceeding with testing devices that are most representative of each category of GPS devices, and thus the most significant portions of the market for such devices, as planned.

LightSquared hopes that the Department of Transportation's testing if done right can contribute to the understanding that will be promoted by the Roberson study. We would note, however, as GPSIA does, that the initial DOT testing plan was released in December 2012, and so far not a single device has yet been tested, nor has any end date of testing been identified. The Roberson testing needs to proceed in a timely way in order to provide relevant input into the Commission's process, and will do so notwithstanding GPSIA's failure to contribute.

LightSquared would note that GPSIA's characterization of the Roberson testing as using standards "of questionable relevance" is wholly incorrect. GPSIA provides no specific criticisms of any of the standards proposed by Roberson that would allow substantiation of such a claim. For example, GPSIA does not explain how anyone would consider a measure such as position error to be of "questionable relevance" to the performance of a GPS device, the primary purpose of which is to report position to a user. GPSIA apparently prefers "internationally agreed" standards, but provides no detail at all as to what standards it means. Assuming GPSIA is again referring to a standard based on an increase in the noise floor, GPSIA fails to address the detailed explanation already provided by the undersigned that this measurement is wholly

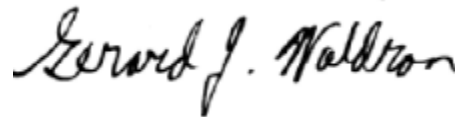
**COVINGTON**

Marlene H. Dortch  
August 18, 2015  
Page 2

inappropriate as a measure of harmful interference and is not, in fact, used by any standards body as a measure of harmful interference for bands adjacent to GPS.<sup>1</sup>

LightSquared looks forward to the completion of the Roberson testing and the provision of useful information to the Commission that shows how GPS and terrestrial broadband can coexist.

Respectfully submitted,

A handwritten signature in black ink that reads "Gerard J. Waldron". The signature is written in a cursive style with a large initial 'G'.

Gerard J. Waldron  
*Counsel to LightSquared*

---

<sup>1</sup> See Letter from Gerard J. Waldron to Marlene H. Dortch, Secretary, FCC, IB Docket No. 12-340; IBFS File Nos. SAT-MOD-20101118-00239; SAT-MOD-20120928-00160; SAT-MOD-20120928-00161; SES-MOD-20121001-00872 (filed July 2, 2015) at 5-6.