

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
Application of Deere & Company)	File No. SES-MOD-20141030-00835
)	
For Modification of)	Call Sign E01011
Earth Station License)	

REPLY OF HARBINGER CAPITAL PARTNERS FUNDS

Harbinger Capital Partners Funds (“Harbinger”), by its attorneys, hereby submits this Reply to the Opposition to Petition to Deny (“Opposition”) filed by Deere & Company (“Deere”) in response to a Petition to Deny (the “Petition”) that was filed by LightSquared Inc., Debtor-in-Possession, together with its affiliates¹ in the above-captioned proceeding.

Harbinger files this Reply to underscore Deere’s continued attempts to avoid addressing very serious questions regarding its conduct by attacking LightSquared’s motivation in raising those questions. That is, just as Deere did in its Opposition to LightSquared’s pending Petition for Reconsideration² of the renewal of Deere’s underlying license, Deere tries to misdirect the Commission’s focus from Deere’s

¹ As used herein, we refer to LightSquared, Inc., both in current debtor-in-possession status, and in its pre-bankruptcy petition form, together with its affiliates, as “LightSquared.” Harbinger made enormous investment in LightSquared prior to its bankruptcy status and will have a substantial financial interest in the company as it comes out of bankruptcy, pending Commission approval of applications for assignment of licenses that are necessary for the implementation of the Bankruptcy Court’s plan for reorganization.

² Application of Deere & Company for Renewal of Earth Station License, SES-RWL-20110908-01047, Call Sign E010011; LightSquared Petition for Reconsideration, filed Oct. 14, 2011; Opposition of Deere & Company to Petition for Reconsideration of LightSquared, Inc., filed Oct. 27, 2011.

questionable conduct to the *bona fides* of LightSquared in raising issues about that conduct.

Harbinger stresses that the issue here and before the Commission and in the pending Petition for Reconsideration is not LightSquared's conduct, but Deere's conduct: Most particularly, even if Deere is found to have held a valid license that previously could have been renewed, does it even today operate in accordance with the conditions of that license and the underlying Commission rules that govern such operation? The record evidence strongly suggests that Deere does not.

There is, however, one point made in Deere's Opposition that Harbinger supports. At least as to most of the issues raised in the Petition, "the Commission could address those objections by acting on the long-pending Petition for Reconsideration."³ Harbinger urges the Commission to do so as soon as possible.

Respectfully submitted,

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³ Opposition at 3.

CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of April, 2015, a copy of the foregoing Reply of Harbinger Capital Partners Funds was sent by first-class, United States mail to the following:

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