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## Gerard J. Waldron

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December 10, 2015

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

Re: Written *ex parte* presentation in IB Docket No. 12-340; IB Docket No. 11-109; IBFS File Nos. SAT-MOD-20101118-00239; SAT-MOD-20120928-00160; SAT-MOD-20120928-00161; SES-MOD-20121001-00872; SES-RWL-20110908-01047; SES-MOD-20141030-00835

Dear Ms. Dortch:

On December 8, 2015, Reed Hundt and the undersigned met with Phil Verveer, Senior Counselor to Chairman Wheeler. We also met with Ron Repasi, Deputy Chief of the Office of Engineering and Technology; Charles Mathias, Associate Bureau Chief of the Wireless Telecommunications Bureau; Paul Murray, Assistant Bureau Chief of the Wireless Telecommunications Bureau; Bob Nelson, Chief Engineer of the International Bureau; and Jennifer Tatel, Associate General Counsel of the Office of General Counsel. The purpose of the meetings was to explain in detail the LightSquared-Deere Settlement Agreement (submitted to the above-captioned record on December 8, hereinafter "Coexistence Agreement"). The parties used the attached chart to illustrate the limitations on LightSquared's network deployment that the parties agreed to as part of the Coexistence Agreement.

The parties began by indicating that the chart illustrates LightSquared's spectrum in yellow. The first and most important element of the Coexistence Agreement is LightSquared's abandonment of the 1545-1555 MHz band marked with the "X." The "X" reflects a promise on LightSquared's part to ask the FCC to modify its license so as to abandon the spectrum for any terrestrial use. The parties then reviewed the operational limitations contained in the Coexistence Agreement. The numbers in black are the limits in the company's current FCC licenses. The numbers in red underneath each of these blocks show the agreed-to power limits in the Coexistence Agreement. The parties emphasized that lowering the power level is an important concession and goes a long way towards addressing the GPS industry's interference concerns.

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The parties then discussed the out-of-band-emissions (OOBE) limitations in the Coexistence Agreement. The numbers in black are the OOBE limits in the company's current licenses. The numbers in red are the new limits the company has agreed to abide by. The parties discussed the significant reduction in OOBE beginning at 1625 MHz, with an OOBE limit of -34 dBW, and moving dramatically down (given the log scale) a steep slope to -105 dBW. Lastly, the parties discussed the downlink limits. The parties noted that the red numbers for these bands are not as low because the downlink applies from the point of the transmitter high up on a tower.

The parties cited paragraph 3 of the Coexistence Agreement, which states that: "Deere, acting as itself or through any third party, will not object to deployment by LightSquared of a network in the spectrum bands 1526-1536 MHz, 1627.5-1637.5 MHz, 1646.5-1656.5 MHz, and 1670-1700 MHz as long as such deployment is consistent with such filings." The parties further expressed the view that this significant compromise should establish a constructive industry paradigm that gives clarity to all relevant firms and government agencies, and in an appropriately open and timely process ought to lead to modification and use, consistent with the compromise's terms, of the relevant spectrum licenses.

The parties also said that LightSquared would soon amend its pending letter asking for a public notice in connection with 1675-80 MHz, and that as amended that notice could run concurrently with the public process relating to LightSquared's licenses, since the compromise relates to the entirety of these issues.

Please direct any questions to the undersigned.

Sincerely,

/s/

Gerard J. Waldron

Counsel to New LightSquared LLC

cc: Phil Verveer

**Edward Smith** 

Louis Peraertz

Joanna Thomas

Erin McGrath

Brendan Carr

Julius Knapp

Ron Repasi

Roger Sherman

Charles Mathias

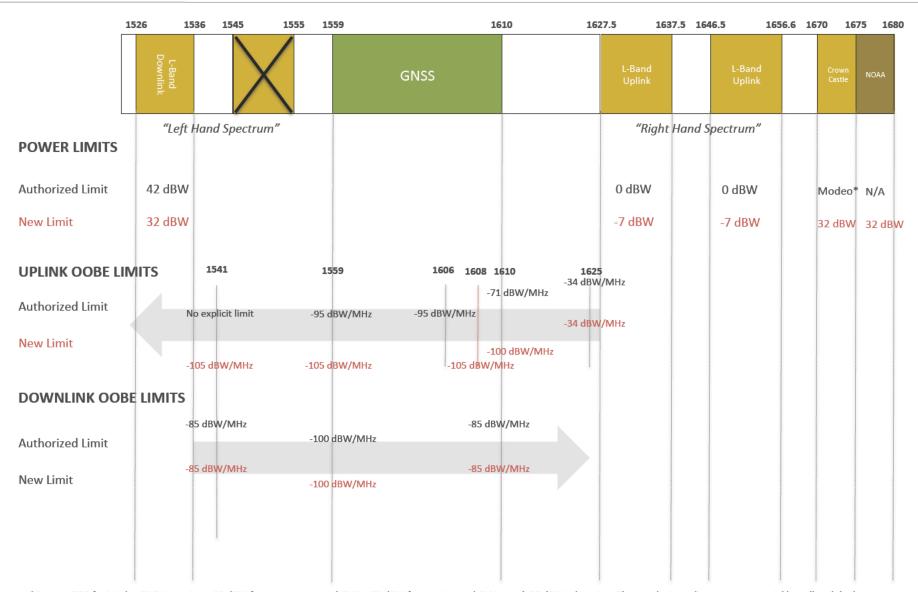
Paul Murray

**Bob Nelson** 

Jon Chambers

Jennifer Tatel

## New LightSquared/Deere Power and Out of Band Emissions Limits



<sup>\*</sup>Current EIRP for Modeo DVB-H service is 36 dBW for certain non-rural CMAs, 39 dBW for certain rural CMAs, and 26 dBW otherwise. The new limit applies to any terrestrial broadband deployment.