

**Comment to FCC IB SES-MOD-20170413-00389, SES-MOD-20170413-00389, SES-AMD-20170726-00812  
and SES-AMD-20170726-00813**

Hexagon Positioning Intelligence submits these comments in response to the applications submitted by Iridium Satellite LLC and Iridium Carrier Services LLC seeking authority to add to its existing licenses operating parameters for a new class of user terminals to be deployed with the second-generation Iridium NEXT satellite system in the 1618.725-1626.5 MHz band

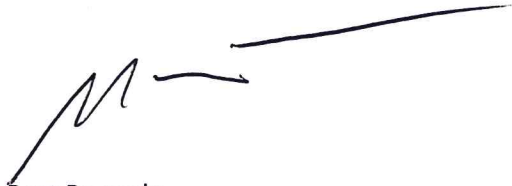
Hexagon is a leading global provider of information technologies that drive productivity and quality across geospatial and industrial enterprise applications. Hexagon Positioning Intelligence (HPI) provides satellite positioning and correction solutions for land, sea and air. HPI encompasses NovAtel based in Calgary, Canada, Antcom based in Torrance, California, NovAtel America based in Houston, Texas, and Veripos also in Houston, Texas. NovAtel and Antcom design and manufacture Global Navigation Satellite System (GNSS) receivers and antennas, delivering global satellites positioning products recognized for technical innovation, unsurpassed quality and industry leading customer support. Veripos provides GNSS correction services utilizing Mobile Satellite Service (MSS) L-Band services. Hexagon Positioning Intelligence GNSS equipment and services are utilized in numerous industries in the USA and are generally private labelled. Major industries served are aerospace & defense, marine exploration & operation, agriculture, autonomous and robotic applications, geomatics & surveying, airborne and ground mapping, and timing for critical national infrastructure.

Hexagon requests, that radio navigation satellite service ("RNSS") receivers operating in the 1559-1610 MHz band are adequately protected from out-of-band emissions ("OOBE") generated from the new Certus mobile earth station ("MES") terminals that will operate on the second generation Iridium satellite system.

Certain statements in the modification application regarding output power and amount of terminals to be deployed cause great concern regarding the unimpeded operation of RNSS receivers. The application does not include enough information to simulate the impact properly.

2

Hexagon politely requests that the FCC will exercise the same due diligence than during previous modification applications close to the RNSS bands (for example docket 11-109) and establish a technical working group or a similar testing process, that ensures unimpeded coexistence of the modified Iridium terminals with the established RNSS systems.



Best Regards

Michael Ritter

President Hexagon Positioning Intelligence