

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

In the Matter of	)	
	)	
LightSquared Subsidiary LLC	)	File No. SAT-MOD-20101118-00239
	)	
Request for Modification of its Authority	)	
for an Ancillary Terrestrial Component	)	

**COMMENTS OF THE U.S. GPS INDUSTRY COUNCIL**

The U.S. GPS Industry Council (the “Council”) hereby submits its comments in response to the request of LightSquared Subsidiary LLC (“LightSquared”) to extend the deadline by which LightSquared is required to submit a report (the “Working Group Report”) to the Federal Communications Commission (“FCC”) demonstrating the compatibility of its Ancillary Terrestrial Component (“ATC”) operations with the Global Positioning System (“GPS”). The Council believes that no extension is required and that the material generated by the Working Group established as a result of the *LightSquared Order*<sup>1/</sup> should be submitted promptly.

Since the Working Group was established pursuant to the *LightSquared Order*, the Council’s members have worked diligently to timely submit the interim reports due to the FCC on February 25 and the 15<sup>th</sup> of each month thereafter. Over the past several months, the Council’s members have devoted countless hours to testing devices against overload and desensitization and preparing reports describing their findings. The Council considers the reports prepared to date to be final and ready for submission as part of the greater Working Group Report.

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<sup>1/</sup> *LightSquared Subsidiary LLC, Request for Modification of its Authority for an Ancillary Terrestrial Component, Order and Authorization, 26 FCC Rcd 849 (2010) (“LightSquared Order”).*

Chairman Genachowski has committed to establish a public comment cycle to give parties further opportunities to present their views on the Working Group's Report.<sup>2/</sup> If there is additional information that LightSquared believes is not contained in the Working Group Report, it, and other interested parties, will have the opportunity to submit that additional information as part of the public comment cycle. The submission of the Working Group Report should not be delayed simply to accommodate additional information that can be submitted at a later date. LightSquared should submit the vast majority of the material which is complete now as part of the Working Group Report. Any additional material may be submitted via a supplemental filing or during the public comment cycle.

The *LightSquared Order* has caused serious concern within the GPS industry and the Council's members are anxious for the FCC to resolve this matter promptly. It urges the FCC to adhere to the June 15 deadline established in the *LightSquared Order* so that it can begin to assess the findings to date. The FCC can assess any further findings when they are submitted.

Respectfully submitted,

THE U.S. GPS INDUSTRY COUNCIL

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<sup>2/</sup> See Letter from Julius Genachowski, Chairman, FCC, to the Honorable Charles E. Grassley, United States Senate, at 3 (May 31, 2011).