

Russell H. Fox
202 434 7483
rfox@mintz.com



555 12th Street NW
Suite 1100
Washington, DC 20004
202 434 7300
mintz.com

Via E-Mail

May 22, 2023

Scott Blake Harris
Senior Spectrum Advisor
Office of the Assistant Secretary
National Telecommunications and Information Agency
1401 Constitution Avenue, NW
Washington, DC 20230

Re: **Docket No. 230308-0068:** Development of a National Spectrum Strategy

Dear Mr. Harris:

This will confirm that on May 15, 2023, Jim Kirkland, Senior Vice President, External Affairs of Trimble Inc. (“Trimble”) and I met with you and others to discuss the above-captioned proceeding regarding the development and implementation of a National Spectrum Strategy for the United States (“NSS”).

We noted that Trimble was the first to commercialize industrial applications of Global Positioning System (“GPS”) signals, improving the performance of positioning information in, among others, the agriculture, construction and surveying industries. And Trimble is only one segment of the GPS economy, the loss of which has been estimated to be greater than \$1 billion per day. That is why Trimble urged the National Telecommunications and Information Administration (“NTIA”), as it develops the NSS, to ensure that GPS continues to enjoy an interference-free environment. By grouping like services together, spectrum managers can help recognize, among other things, the differences between communications and navigation services, the latter of which operates (at least in the case of GPS) below the thermal noise floor. Finally, while Trimble appreciates the efforts of the Federal Communications Commission and NTIA to consider the role of receiver performance in spectrum management, both should recognize that modification of receiver design can limit the full performance of a receiver.

If there are any questions regarding the foregoing, please contact the undersigned.

Respectfully submitted,

/s/ Russell H. Fox

Russell H. Fox
Counsel for Trimble