



JUL - 6 2011

The Honorable Julius Genachowski
Chairman
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: LightSquared Subsidiary LLC; Request for Modification of its Authority
for an Ancillary Terrestrial Component, SAT-MOD-20101118-00239; Call Sign: S2358

Dear Chairman Genachowski:

For your consideration in the above-referenced matter, the National Telecommunications and Information Administration (NTIA) submits the attached report entitled, *Assessment of LightSquared Terrestrial Broadband System Effects on GPS Receivers and GPS-dependent Applications* (June 1, 2011), prepared by the National Space-Based Positioning, Navigation, and Timing Systems Engineering Forum (NPEF) on behalf of the National Executive Committee for Space-Based Positioning, Navigation, and Timing (EXCOM).¹ The results of these measurements clearly demonstrate that implementing the LightSquared Subsidiary LLC (LightSquared) planned deployment for terrestrial operations poses a significant potential for harmful interference to Global Positioning System (GPS) services. Thus, the concerns stated in my letter to you dated January 12, 2011, remain unresolved.

The NPEF based its test plan on LightSquared's planned deployment, and thus, its tests were limited in scope and did not consider or test other configurations of the LightSquared system. I note that LightSquared has now proposed a modification to its planned deployment. NTIA will work with the Federal Communications Commission (FCC) and the federal agencies to determine the impact of LightSquared's modification. Therefore, NTIA supports the EXCOM's recommendation that additional tests be performed and recommends that the FCC continue to withhold authorization for LightSquared to commence commercial operations until all the available test data can be analyzed and all valid concerns have been resolved.

NTIA recognizes that the FCC's Order established a Technical Working Group (TWG) co-chaired by LightSquared and the United States GPS Industry Council to address the GPS interference issues.² NTIA is reviewing the report recently filed by the TWG and will consider

¹ NTIA will provide additional classified results under separate cover.

² LightSquared Subsidiary LLC; Request for Modification of its Authority for an Ancillary Terrestrial Component, SAT-MOD-20101118-00239; Call Sign: S2358, Order and Authorization (Order), 26 F.C.C. Rcd. 566, 588 (2011).

the output of any other organizations that provide test results. The Order further provided that the FCC would consult with NTIA before making a final decision.³ NTIA looks forward to consulting with the FCC when it has received all of the test results.

I look forward to working with you as the FCC continues to evaluate LightSquared's request. If you have any questions regarding this letter, please feel free to contact me.

Sincerely,



Lawrence E. Strickling

Enclosure

³ *Id.* at 586-587.