



Government Affairs

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July 28, 2011

The Honorable Julius Genachowski, Chairman
Federal Communications Commission
445 12th Street, S.W. Room 86201
Washington, D.C. 20554

Re: FCC IB 11-109; LightSquared application request for Modification of its Authority for Ancillary Terrestrial Component [FCC File No. SAT-MOD-20101118-00239]

Dear Chairman Genachowski:

On behalf of the millions of recreational boaters who depend upon — and sometimes bet their lives on — accurate and reliable Global Positioning System service, I write with a simple but urgent request: Protect the integrity of the GPS system.

As the regulatory body governing the use of public radio spectrum, the Federal Communications Commission must reconsider its conditional approval of the LightSquared LLC broadband network proposal until it can be demonstrated unequivocally that the proposed service will in no way compromise GPS service as it exists today. Nor must it interfere with the many critical GPS functions that are now integral to myriad commercial, public safety, national security and recreational activities.

As you are aware, the June 30, 2011 analysis by the Technical Working Group reported contradictory findings concerning the effects that the proposed LightSquared service can be expected to have on GPS. Indeed, most experts who are not directly engaged by LightSquared expressed significant reservations regarding many aspects of the proposed service.

The report specifically stated that “The General Location/Navigation sub-team has concluded that all phases of the LightSquared deployment plan will result in widespread harmful interference to GPS signals and service and that mitigation is not possible” (Technical Working Group Final Report, Executive Summary, 2.7.3.1.1, GPS Industry Perspective, Page 18.)” From the recreational boating perspective, it is critical to note that while a few marine GPS units were tested, none of the operational scenarios included recreational marine applications. That very fact is already causing grave concern for the millions of boaters who rely on GPS for accurate position finding, charting and safe navigation routing. Moreover, as you know, last year the U.S. Coast Guard shut down the Loran navigation system, making recreational mariners solely dependent on GPS for electronic navigation. However, our concerns are by no means limited to navigation.

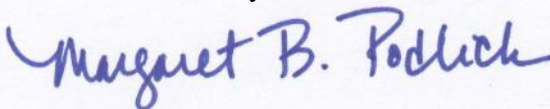
Since the advent of Digital Selective Calling technology in VHF-FM marine radios, The Boat Owners Association of the United States (BoatU.S.) has, in partnership with the U.S. Coast Guard, operated a free service by which boaters may register their VHF radios and obtain a Maritime Mobile Service Identity number, the key element in efficient search-and-rescue utilizing the Coast Guard's highly effective Rescue 21 system. The encoded position information that is now be transmitted by DSC-equipped radios, as well as in 406 EPIRBs and Personal Locator Beacons, depends entirely on accurate, uncompromised GPS signals. Any degradation of the GPS signal will shake the confidence of recreational boaters in the nation's GPS-reliant Search and Rescue systems.

The mitigation measures that LightSquared proposes, such as lower transmission power levels and the addition of electronic filters on GPS receivers — filters that have yet to be produced — will still leave the vast majority of the millions of existing GPS units vulnerable to interference and degraded performance. Additionally, asking hundreds of millions of owners to retrofit their GPS units is an unreasonable and impractical solution to accommodate a new use of the spectrum.

In summary, and for all the above reasons, we believe the Commission should immediately rescind its January provisional decision. Any future proposed uses of the spectrum by LightSquared or others must be fully and carefully vetted, with research and significant public involvement, before proceeding. The nation's boaters, anglers, first responders, outdoor adventurers, pilots, and drivers all depend on a steady GPS signal. As the national caretaker of the spectrum, the FCC is entrusted with its care and function. As a result, it is vital that the FCC insure that new uses of that spectrum do not cause harm to existing and vital safety and security functions.

Thank you for your attention to these concerns. Please contact me if I can provide additional information regarding this or any other issues involving recreational boating and use of the public radio spectrum.

Sincerely,



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