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## FCC's Consideration of LightSquared's Requests Must "Not Come at Expense of Critical GPS Services;" Commission Must Conduct Comprehensive Assessment of Costs and Benefits

Coalition to Save Our GPS Files Comments with FCC

WASHINGTON, D.C. (Dec. 18, 2012) – The Coalition to Save Our GPS has stressed to the Federal Communications Commission that as it considers expansion of terrestrial use of the mobile satellite spectrum (MSS) adjacent to GPS it is vitally important that expansion "not come at the expense of critical GPS services" and called for a "comprehensive consideration of all relevant public policy issues" and careful consideration of "the overall public interest, not simply the immediate exigencies surrounding the proposed business plan of a private party."

The FCC is considering a request by LightSquared to modify its ancillary terrestrial component (ATC) authority, and the company is petitioning the FCC to revise its rules regarding LightSquared's terrestrial use of its MSS spectrum. Commenting on LightSquared's requests, the Coalition late Monday filed comments with the FCC in which it urged the Commission "to address any unresolved issues regarding interference to GPS" before allowing LightSquared "to launch the terrestrial services contemplated" in its proposals.

The Coalition stressed that while it "fully supports the Commission's goal to make more spectrum available for wireless broadband services and remains committed to working with all relevant stakeholders to achieve this goal, such an objective must not come at the expense of critical GPS services." The Coalition added, "The Commission must ensure that any action it takes in these proceedings represents sound spectrum management."

The Coalition, which has more than 70 members and 130 associate members representing more than 100,000 companies and millions of employees in a broad range of industries, made four major points in its 21 page filing:

 Consistent with the findings of the Commission's International Bureau and the National Telecommunications and Information Administration, LightSquared should be required to relinquish terrestrial authority in the upper 10 megahertz of the L-Band at 1545-1555 MHz due to the potential for harmful "overload" interference to GPS receivers from operations in that band.

- The Commission should initiate a rulemaking proceeding to address the potential use of the lower 10 megahertz of the L-Band at 1526-1536 MHz as well as the 1627.5-1637 MHz and the 1646.7-1656.7 MHz bands for terrestrial operations and continue its ongoing rulemaking proceeding to determine the feasibility of using the 1675-1680 MHz band for terrestrial operations.
- The Coalition reiterated that the MSS spectrum which LightSquared proposes to repurpose for ubiquitous high-power terrestrial use is satellite spectrum in a band historically reserved for satellite use. The Coalition stated: "Revisionist history and misperceptions of prior decisions aside, the Commission has previously authorized only limited 'fill in' terrestrial use of the MSS band by MSS license holders to enhance a satellite-based communications service. The Commission should only modify the policies and rules that limited terrestrial operations in the MSS band after considering in depth the costs and benefits, and therefore, the overall public interest, in authorizing more extensive high-powered terrestrial operations in satellite spectrum closely adjacent to a critical public utility, GPS."
- Given the extraordinary success of GPS, with over 500 million receivers in use in the U.S. alone, the Commission should be particularly careful in weighing costs of any forced transition away from policies which preserve the historically "quiet neighborhood" adjacent to GPS. The Coalition stated that, "Costs include not just the expense of replacing devices in the field, which might be addressed through a sufficiently long transition period, but also the impact of engineering changes on the costs of such a large number of devices and the performance penalties that would result from reengineering the incredible variety of GPS receivers to filter out signals billions of times stronger than GPS signals as received on Earth. Given the tremendous and exponentially increasing success and penetration of GPS technology, as currently designed, in virtually every significant business and consumer activity, the Commission should set the bar very high for those who would alter the development of GPS technology to force accommodation of high-powered terrestrial operations in nearby spectrum, even if such accommodation is believed to be "technically feasible" in some narrow sense by some proponents. The Commission has not evaluated this fundamental issue, and it must carefully make any predictive judgments."

The Coalition said it recognizes the need for additional spectrum to support the growth of both the mobile broadband market and the mobile wireless industry, saying that it "strongly supports the Commissions efforts to make such spectrum available when it engages in sound spectrum management and determines that the technical bases for doing so are sound."

The Coalition concluded its comments by declaring that the FCC "must continue to ensure that GPS operations are not disturbed by the conversion of spectrum for terrestrial operations. The

Commission should modify LightSquared's license expeditiously to remove its ATC authority in the Upper L-Band. However, the proposed use of the other bands that LightSquared targets – the Lower L-Band spectrum, the Uplink Bands and the 1675-1680 MHz band – all require additional study."

The full filing is viewable here.

## **About the Coalition**

The "Coalition to Save Our GPS" is working to resolve a serious threat to the Global Positioning System. The FCC granted a highly unusual conditional waiver for a proposal to build 40,000 ground stations that could cause widespread interference with GPS signals – endangering a national utility which millions of Americans rely on every day. The conditional waiver was granted to a company called LightSquared.

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