



January 21, 2011

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street SW
Washington, DC 20554

Dear Ms. Dortch:

Re: LightSquared Application for Modification -- FCC File No. SAT-MOD-20101118-00239

In March 2010, the Commission authorized LightSquared to use its L-band frequencies to build a new national 4G network with a mandate to cover 260 million PoPs by 2015. LightSquared is investing billions of dollars to build this network, which will provide a healthy boost in jobs and economic development and will provide a robust, open-access network that will permit reliable and affordable services to customers across the country in every market segment.

The above-referenced application proposes a minor modification in the manner in which we intend to provide an integrated satellite-terrestrial broadband service. Grant of this application is an essential building block for our network and requires quick, favorable action so that we may continue to roll out our network and meet the rigorous construction timetable that the Commission has made a condition of our authorization.

The record in this proceeding, however, includes concerns from the GPS industry about possible overload of GPS devices by LightSquared base stations. Nothing in the integrated service application changes the operating characteristics of LightSquared's network or its intended use. Nevertheless, LightSquared takes this issue very seriously and believes that it is appropriate for interested parties to devote resources to its solution as soon as possible.

LightSquared is confident that this issue can be resolved without delaying deployment of wireless broadband, generally, or the LightSquared network specifically. Like other network operators, LightSquared itself must be able to bring devices onto its network that incorporate GPS technology, so it has a strong incentive to resolve this issue. Indeed, LightSquared was cognizant of this issue when we made the build-out commitments that served as the basis for the Commission's own requirements in its March 2010 Order.

Consequently, being respectful of the concerns raised at the FCC by the GPS community, we are willing to accept as a condition on a grant of our request the creation of a process to address interference concerns regarding GPS and, further, that this process must be completed to the FCC's satisfaction before LightSquared commences offering commercial service pursuant to approval of our requested modification with regard to our L-band MSS frequencies.

Be assured that Lightsquared will work diligently and cooperatively with the Commission, NTIA and the federal agencies, and with the GPS community. In the past, we have repeatedly demonstrated our ability to do so to resolve potential interference issues well in advance of any threat to GPS use. LightSquared's record of concern and cooperation includes the following:

- In 2002, LightSquared's predecessor agreed with GPS industry representatives to protect GPS with more stringent out-of-band-emission limits than those required by the FCC's rules.
- At the device level, since 2009 LightSquared has sponsored tests with both GPS navigation-only devices and GPS-capable phones. So far, such tests have shown very limited adverse impact on GPS as almost all receivers were resilient to predicted interference from LightSquared's operations.
- At the base station level, throughout 2010, LightSquared successfully worked with the GPS community to design and develop a filter that eliminates interference for those CMRS base stations using GPS timing.
- LightSquared remains committed to continued testing and refining technical solutions to help resolve interference issues between GPS and LightSquared and any other future wireless operators in the frequency bands below 2 GHz.

Against the backdrop of this record of cooperation, LightSquared now pledges its full cooperation and commitment to a rigorous process to resolve issues of interference to GPS in a comprehensive manner. With this process, LightSquared believes the Commission can create a model of responsible spectrum management that will facilitate the prompt deployment of LightSquared's terrestrial broadband services to the American public while doing its part in protecting the full value of GPS.

Sincerely,

/s/Sanjiv Ahuja

Sanjiv Ahuja
Chairman & CEO