

January 31, 2020

**VIA EMAIL AND FEDERAL EXPRESS**

The Honorable Ajit Pai  
Chairman  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

Dear Chairman Pai:

As the U.S. remains in an extremely competitive race to develop next-generation technologies, the role of the Federal Communications Commission (FCC) has never been more important. Your leadership over the past three years has substantially advanced our nation's progress in this race. Like you, we recognize that much remains to be done if we are to cement our global leadership in 5G, but in order to achieve this objective, the industry must have certainty regarding the spectrum that is so critical to that success. It was that very certainty from our government that propelled our country's success in 4G, giving the wireless industry the confidence necessary to drive technology standards discussions and roll out 4G networks with urgency. As a result, we were years ahead in deploying technologies that ushered in an era of mobile connectivity, investment, innovation and consumer prosperity that were the envy of the world.

At the start of this decade, the FCC is again faced with critical decisions where spectrum certainty will have a positive ripple effect on the entire wireless ecosystem, spurring greater investment and innovation and delivering tremendous national economic and security benefits. That's why we write to urge your final action on the Ligado mid-band spectrum proceeding so we can begin working with GPS and our partners in industry and the government to deploy this spectrum for the American public and critical infrastructure industries as soon as possible.

More than four years ago, we put together an engineering-driven and fact-based plan that would make 40 MHz of mid-band spectrum available for 5G. From the very beginning, we worked alongside GPS manufacturers to develop a plan that would work for them. This meant adjusting operating parameters to levels that would ensure coexistence and require post-approval coordination. Government testing and analysis

confirmed that this plan would protect GPS and address all concerns raised in this proceeding. Our comprehensive approach is comprised of stringent operating parameters, strict coordination requirements and a commitment to work with the government to identify and upgrade equipment as necessary. Today, we remain 100% committed to being a good spectrum neighbor to all of our neighbors and we want you to know that commitment will not waver.

The next step is for the FCC to provide all stakeholders with spectrum certainty. All stakeholders need that certainty in order to begin working in earnest on building a 5G network, such as by coordinating on standards and developing ecosystem partnerships. It is only with this certainty that we can ensure we fulfill our commitments and invest in moving our country toward 5G and more secure, resilient and robust uses of GPS that allow the technology to remain the gold standard of global navigation systems. However, we are also keenly aware that time is not on the side of our country or Ligado, and the speed at which the rest of the world is moving toward 5G demands we double-down on all our efforts, working together to bring this long process to a conclusion as soon as possible.

As you know, the FCC record is complete, and your agency has articulated a path forward. We are fully prepared to do our part to advance our nation's 5G agenda, and we look forward to you taking the next step on Ligado.

Sincerely,



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Ivan G. Seidenberg  
Chairman



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Doug Smith  
Chief Executive Officer

cc: Ms. Marlene Dortch (IB Docket No. 11-109)