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March 31, 2017

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

**Re: *Ex parte* presentation in IB Docket No. 11-109;
IBFS File Nos. SES-MOD-20151231-00981, SAT-MOD-20151231-00090, and
SAT-MOD-20151231-00091**

Dear Ms. Dortch:

On March 29, 2017, Valerie Green, Executive Vice President and Chief Legal Officer of Ligado Networks LLC (“Ligado”), Brian Smith of Covington and the undersigned met with Ron Repasi and Paul Murray of the Office of Engineering and Technology; Charles Mathias, Paul Powell, and Aalok Mehta of the Wireless Telecommunications Bureau; Jennifer Tatel of the Office of General Counsel; and Bob Nelson of the International Bureau. The parties discussed the need to develop a license condition establishing power levels for Ligado’s operations in 1526-1536 MHz so that these operations will not interfere with certified aviation devices.

Ligado’s 2015 license modification applications requested that the Commission impose a license condition that would require the company to reduce the power of each of its terrestrial transmitters operating in the lower downlink to the power level necessary to achieve compatibility with current and future technical standards for certified aviation GPS receivers. We reviewed the extensive engagement the company has had with the FAA and other stakeholders,¹ and shared that applying the model developed in consultation with the FAA and other stakeholders to potential tower sites has produced power ranges of 9 to 13 dBW EIRP. We discussed that the purpose of the model is to protect certified aviation operations, but that the lower power levels would similarly protect and benefit *all* GPS devices, including noncertified aviation receivers.

¹ See Letter from Gerard J. Waldron, Counsel to Ligado Networks LLC, to Marlene H. Dortch, Secretary, Federal Communications Commission, IB Docket No. 11-109, RM-11681; IBFS File Nos. SES-MOD-20151231-00981; SAT-MOD-20151231-00090; SAT-MOD-20151231-00091, at 1-2 (Feb. 24, 2017).

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We also discussed possible additional responsibilities Ligado would undertake to monitor compliance and that these additional steps would be *in addition to* the Commission's existing enforcement authority. We described Ligado's commitment to transparency regarding the calculation of the power limits for each tower, and the company's plans to respond to and coordinate with both the Commission's Enforcement Bureau as well as other relevant inquiries to ensure that Ligado's operations and GPS coexist as provided under the license condition. As part of this commitment, Ligado will ensure that information regarding each tower site calculation is submitted to the Commission. We discussed various ideas for how different interested parties could access this information.

We also briefly discussed Iridium's latest filing focused on the 1627-1637 MHz band. The filing contains more invective than fact, repeats points Iridium has made before, ignores the substantial compromise that Ligado has put on the table, and suggests that Iridium's concerns seem grounded more in competitive advantage than good spectrum policy.

On March 31, the undersigned spoke via telephone with Mr. Mathias concerning recent testing results and adjacent band compatibility and the appropriate measurand for harmful interference. We discussed previously submitted evidence about the imprecision and stochastic nature of surrogates for device performance as opposed to measuring actual performance itself.

Please direct any questions to the undersigned.

Sincerely,

/s/ Gerard J. Waldron

Gerard J. Waldron

Counsel to Ligado Networks LLC

cc: Mr. Charles Mathias
Mr. Bob Nelson
Mr. Paul Murray
Ms. Jennifer Tatel
Mr. Ron Repasi
Mr. Paul Powell
Mr. Aalok Mehta