REDACTED FOR PUBLIC INSPECTION

ligado NETWORKS | Making Stronger Connections

April 28, 2017

Accepted / Filed

APR 28 2017

Federal Communications Commission
Office of the Secretary

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

DOCKET FILE COPY ORIGINAL

Re: IB Docket No. 08-184 and IBFS File No. SAT-MOD-20101118-00239

Dear Ms. Dortch:

Ligado Networks Subsidiary LLC ("Ligado")[1] hereby submits this combined semi-annual report pursuant to the *Memorandum Opinion and Order and Declaratory Ruling* adopted by the Commission on March 26, 2010 in IB Docket No. 08-184 (the "*MO&O*"), and quarterly report pursuant to the *Order and Authorization* adopted by the Commission on January 26, 2011 in IBFS File No. SAT-MOD-20101118-00239 (the "*O&A*") (collectively, the "*Orders*"). By separate letter, Ligado requests confidential treatment of this report.

On February 15, 2012, the Commission released a Public Notice seeking comment on the letter sent to it on February 14, 2012 by the National Telecommunications and Information Administration's (NTIA).[2] The Public Notice addressed certain issues related to the potential incompatibility of GPS receivers with Ligado's planned operations, and recommended vacating the Commission's *Conditional Waiver Order* and modifying Ligado's satellite license to suspend indefinitely its ATC authority.

The *Conditional Waiver Order* itself provides that Ligado and members of the GPS industry must resolve certain outstanding issues "before Ligado commences offering commercial service pursuant to [the waiver granted in the *Conditional Waiver Order*] on its L-band MSS frequencies."[3] In light of the Commission's Public Notice and the unresolved condition in the *Conditional Waiver Order*, Ligado is not yet providing

[1] *See* Letter from Jeffrey J. Carlisle, Executive Vice President, LightSquared GP Inc., to Marlene H. Dortch, Secretary, FCC (July 20, 2010) (notifying the Commission that SkyTerra had changed its name to LightSquared); Letter from Jeffrey J. Carlisle, Executive Vice President, Ligado Networks Subsidiary LLC to Marlene H. Dortch, Secretary, FCC (Feb. 11, 2016) (notifying the Commission that LightSquared had changed its name to Ligado Networks).

[2] *See Public Notice: International Bureau Invites Comment on NTIA Letter Regarding LightSquared Conditional Waiver*, IB Docket No. 11-109, DA 12-214 (Feb. 15, 2012).

[3] *LightSquared Subsidiary LLC*, 26 FCC Rcd 566, at ¶ 41 (2011).

No. of Copies rec'd 0+4
List ABCDE

commercial service using its ATC authority. Ligado remains committed to working cooperatively with Congress, federal government agencies, and the GPS industry to address the concerns raised by the GPS industry and others.

Beginning in September of 2012, Ligado made a series of filings with the Commission proposing solutions that would allow it to deploy terrestrial broadband service in a way that ensures that GPS receivers are compatible with Ligado's operations. These filings have been accepted by the Commission and all have been placed on public notice for comment.[4]

SITE DEVELOPMENT

As a result of the Commission's Public Notice of February 15, 2012, Ligado has not undertaken any significant site development activity related to the provision of two-way terrestrial mobile service during this reporting period.[5] Ligado has focused its efforts on resolving the underlying spectrum and deployment issues identified by the Commission through the series of filings referenced above.

DEVICE MANUFACTURERS

Qualcomm Incorporated has integrated L-Band LTE technology in its chipset roadmap and has developed an advanced satellite air interface technology to enable the satellite mode of operation in mobile devices.

SATELLITE

Each of the satellites operated by Ligado has performed nominally and as expected over the past six months.

PARTICULAR REPORTING REQUIREMENTS

1. Pursuant to reporting requirement III.A of the *O&A*, Ligado reports that as of March 31, 2017 there were approximately [redacted] terminals and approximately [redacted] active private network customers on its MSS-only network. Ligado can only provide an estimate of the latter figure because the company does not have direct access to the subscriber counts of its wholesale customers. As noted above, Ligado is not yet providing commercial MSS/ATC or terrestrial-only services. Accordingly, the number of reportable active terminals and active users on its network in these categories is zero. As the terrestrial network is not yet in

[4] *See Public Notice, Federal Communications Commission Invites Comment on LightSquared Request to Modify Its ATC Authorization*, DA 12-863 (rel. Nov. 16, 2012); *Public Notice, Consumer & Governmental Affairs Bureau Reference Information Center Petition for Rulemaking Filed*, RM No. 11683 (rel. Nov 16, 2012).

[5] Ligado has implemented a one-way DVB-H network in the 1670-1675 MHz band.

ligado NETWORKS | Making Stronger Connections

commercial service, the number of reportable total bytes carried by Ligado's terrestrial network also is zero (*see* Condition 3 to the *MO&O*).

2. Pursuant to reporting requirement III.B of the *O&A*, Ligado provides the following list of components available from mainstream component suppliers to support L-band dual mode operations:

[redacted]

Sincerely,

William Davenport
Senior Vice President & Deputy General Counsel, Regulatory Affairs

cc: Brendan Carr
Tom Sullivan
Jennifer Gilsenan
IB-SATFO@fcc.gov