



The Weather Company, an IBM Business
300 Interstate North Parkway
Atlanta, GA 30339
Mary Glackin, Senior VP, Science and Forecast Operations

June 17, 2016

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

RE: Letter in response to RM-11681 Petition for Rulemaking: Ligado's Request to Allocate the 1675-1680 MHz band for Terrestrial Mobile Use Shared With Federal Use

Dear Ms. Dortch:

The Weather Company, an IBM Business is the world's largest private weather enterprise, helping people make informed decisions – and take action – in the face of weather. The company offers the most accurate, personalized and actionable weather data and insights to millions of consumers and thousands of businesses via Weather's API, its business solutions division, and its own digital products from The Weather Channel (weather.com) and Weather Underground (wunderground.com). The company delivers up to 26 billion forecasts daily and the world's biggest brands in aviation, energy, insurance, media, and government rely on our company services to help improve decision-making and respond to weather's impact on business.

Today, our company utilizes the direct broadcasts from the Geostationary Operational Environmental Satellite (GOES) and we expect to use the direct broadcasts from GOES-R series satellites in the 1675-1695 MHz radio spectrum. As we serve to disseminate National Weather Service alerts to citizens and develop and issue value-added meteorological products for use by our customers, the timely and reliable reception of data from NOAA's geostationary satellites is a very important component of the information needed to create products and services. GOES data is a critical component of our weather decision making tools.

We believe that radio frequency interference that can be generated from strong terrestrial downlinks that share the same spectrum as the relatively weak signals from GOES in space, would have a detrimental impact on the citizens and clients that rely on our services. The Weather Company, an IBM Business, recommends that this spectrum not be shared with commercial interests.

Thank you for the opportunity to share our views in this matter.

Sincerely,

Mary Glackin, Senior VP, Science and Forecast Operations

CC:

The Honorable John Thune, Chairman, Senate Commerce, Science and Transportation Committee

The Honorable Bill Nelson, Ranking Member, Senate Commerce, Science and Transportation Committee

The Honorable Marco Rubio, Chairman, Subcommittee on Oceans, Atmosphere, Fisheries, and Coast Guard

The Honorable Cory Booker, Ranking Member, Subcommittee on Oceans, Atmosphere, Fisheries and Coast Guard

The Honorable Richard Shelby, Chairman, Commerce, Justice, Science, and Related Agencies Subcommittee

The Honorable Barbara Mikulski, Vice Chairwoman, Senate Appropriations Committee

The Honorable Fred Upton, Chairman, House Energy and Commerce Committee

The Honorable Frank Pallone, Jr, Ranking Member, House Energy and Commerce Committee

The Honorable Greg Walden, Chairman, Communications and Technology Subcommittee

The Honorable Anna G. Eshoo, Ranking Member, Communications and Technology Subcommittee

The Honorable Jim Bridenstine, Chairman, Subcommittee on Environment, House Science, Space and Technology Committee

The Honorable Suzanne Bonamici, Ranking Member, Subcommittee on Environment, House Science, Space and Technology Committee

The Honorable John Fleming, Chairman, Subcommittee on Water, Power and Oceans, House Natural Resources Committee

The Honorable Jared Huffman, Ranking Member, Subcommittee on Water, Power and Oceans, House Natural Resources Committee

The Honorable John Culberson, Chairman, Commerce, Justice, Science and Related Agencies Subcommittee

The Honorable Mike Honda, Acting Ranking Member, Commerce, Justice, Science and Related Agencies Subcommittee

The Honorable Lawrence E. Strickling, Assistant Secretary for Communications and Information and NTIA Administrator, Department of Commerce

The Honorable Dr. Kathryn D. Sullivan, Under Secretary of Commerce for Oceans and Atmosphere and NOAA Administrator