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July 7, 2016

Via ECFS

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

Re: *Ex Parte* Submission: RM-11681; IB Docket No. 12-340; IB Docket No 11-109; IBFS File Nos. SES-MOD-20151231-00981; SAT-MOD-20151231-00090; SAT-MOD-20151231-00091; WC Docket No. 10-90; WT Docket No. 10-208; GN Docket No. 14-126; ET Docket No. 15-184

Dear Ms. Dortch

On behalf of Deere & Company (“Deere”), I am attaching for the Commission’s consideration in the above dockets a copy of Deere’s June 13, 2016 submission to the National Advanced Spectrum and Communications Test Network (“NASCTN”) in connection with NASCTN’s draft test proposal entitled *LTE Impacts on GPS Test and Metrology Plan* (“Test Plan”).¹ Consistent with Deere’s contributions in various Commission proceedings, Deere’s primary interest in commenting on the draft NASCTN test plan was to promote a greater understanding and appreciation of high-precision navigation and the risk to GPS and Global Navigation Satellite Service (“GNSS”) technologies presented by new services operating in adjacent spectrum, especially regarding existing widespread and important agricultural and other GPS uses. With respect to the draft NASCTN plan, Deere addressed the appropriate role and design of the proposed NASCTN test particularly in light of the Department of Transportation’s (“DOT’s”) Volpe Center’s ongoing Adjacent Band Compatibility Assessment Plan (“ABC Study”), a transparent and comprehensive initiative examining the spectrum environment adjacent to the 1559-1610 MHz GNSS allocation.

Deere also reaffirmed its support with respect to any initiative evaluating the impact of adjacent signals on GPS and GNSS, including NASCTN’s test, for applying a one (1) dB

¹ Young, William *et al.*, *Draft: LTE Impacts on GPS Test and Metrology Plan*, NATIONAL ADVANCED SPECTRUM AND COMMUNICATIONS TEST NETWORK, at 5 (May 2016) (*Draft NASCTN Plan*).

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decrease in Carrier-to-Noise Power Density (“C/N₀”) as the appropriate metric for determining whether a GPS receiver under test has experienced harmful interference. As Deere has made clear in the instant proceedings, Deere does not support other approaches that would require testing and analysis of many complicated use cases (including those not yet developed) in an attempt to accurately predict the interference impact to the four parameters (accuracy, integrity, availability and continuity) relevant to each such application. Use of a defined change in the noise floor (1 dB) provides a standard that has a long and well-established history in both international and domestic regulatory proceedings as the appropriate interference protection criteria for GPS receivers, is a readily identifiable and predictable metric that all interested parties can take into account now and in the future.

If you have any questions regarding this *ex parte* submission, please do not hesitate to contact the undersigned.

Very truly yours,

/s/

Catherine Wang

Counsel for Deere & Company

Attachment