



July 16, 2018

VIA ELECTRONIC FILING

Marlene Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

RE: American Tower Corporation Letter in Support of Ligado Networks LLC's Amendment to License Modification Applications, IBFS File Nos. SES-MOD-20151231-00981, SAT-MOD-20151231-00090, and SAT-MOD-20151231-00091 (the "Modification Applications") IB Docket No. 11-109

Dear Ms. Dortch:

American Tower Corporation ("ATC") is a global real estate investment trust and a leading independent owner, operator and developer of multitenant communications real estate. ATC has invested heavily in deploying wireless infrastructure that can be used by all providers, incumbent carriers as well as innovative new entrants, to bring broadband wireless services to consumers throughout the country, including, importantly, the 5G services that are on the near horizon. ATC files this letter in support of Ligado Networks LLC's (Ligado) license modification request.

ATC has been following with interest Ligado's efforts to utilize prime mid-band spectrum to help meet the rapidly growing demand for broadband wireless services. On May 31, 2018, Ligado submitted an amendment to its license modification application to dramatically lower the power output that could be used in the 1526-1536 MHz band.¹ As noted by Ligado, this addresses the concerns of the Federal Aviation Administration and the Department of Transportation over possible interference with certified aviation GPS receivers.² This amendment, coupled with Ligado's previous efforts to address the concerns of the GPS community, such as its co-existence agreements with major GPA manufacturers, should clear the way to approve Ligado's application.

Approving Ligado's application and permitting use of this valuable spectrum will help ensure the timely deployment of commercial IoT applications of 5G through Ligado's innovative business plan. ATC agrees with

¹ Amendment to License Modification Applications, IBFS File Nos. SES-MOD-20151231-00981, SAT-MOD-20151231-00090, and SAT-MOD-20151231-00091.

² Comments of Ligado Networks LLC, IB Docket No. 11-109; SAT-AMD-20180531-00044; SAT-AMD-20180531-00045 at 2-3 (filed July 9, 2018.)



commenters that Ligado's balanced proposal "allows for valuable technological advancement that will contribute to the economy and US competitiveness."³

Please contact the undersigned if you have any questions.

Sincerely,

Paul A. Roberts
Vice President, Compliance
American Tower Corporation
3500 Regency Parkway, Suite 100
Cary, NC 27518

³ See, Letter to Marlene Dortch, Secretary, FCC, from Doug Brake, The Information Technology and Innovation Foundation, Ligado Networks LLC Amendment to License Modification Application, SAT-AMD-20180531-00044 and SAT-AMD-20190531, IB Docket 11-109 (filed July 9, 2018).