



Wireless  
Infrastructure  
Association

July 18, 2018

**VIA ELECTRONIC FILING**

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

**Re: WIA Letter in support of Ligado's Amendment to License Modification Applications IBFS File Nos. SES-MOD-20151231-00981, SAT-MOD-20151231-00090, SAT-MOD-20151231-00091, SAT-AMD-20181531-00044 and SAT-AMD-20180531-00045 (the "Modification Applications"); IB Docket No. 11-109**

Dear Ms. Dortch:

Since 1949, the Wireless Infrastructure Association ("WIA")<sup>1</sup> has worked to increase wireless connectivity across the nation. WIA's members promote this goal through investment in modern infrastructure ensuring the United States continues to lead the world in wireless broadband deployment and remain on the forefront of 5G wireless solutions. Ligado's proposal calls on the Commission to approve the terrestrial deployment of Ligado's 40 MHz of mid-band spectrum in the 1500 MHz to 1700 MHz range and to set aside the 10 MHz block of spectrum near GPS frequencies for satellite-only use. WIA supports Ligado Network's innovative use of spectrum to meet the growing demand for wireless services and respectfully requests that the Commission approves Ligado's license modification application amendment<sup>2</sup> accordingly.

Beginning in 2015, Ligado filed numerous comments with the Commission that demonstrated the company's commitment to addressing issues regarding potential interference to neighboring services and its receptiveness to enter into coexistence agreements with major manufacturers of GPS technology. So far, Ligado has kept these

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<sup>1</sup> The Wireless Infrastructure Association (WIA) is the principal organization representing companies that build, design, own, and manage telecommunications facilities throughout the world. WIA's members include carriers, infrastructure providers, and professional services firms.

<sup>2</sup> Amendment to License Modification Applications IBFS File Nos. SES-MOD-20151231-00981, SAT-MOD-20151231-00090, and SAT-MOD-20151231-00091, IB Docket No. 11-109, filed May 31, 2018, available at <https://bit.ly/2kC9S3L>.

commitments and taken additional measures to address any remaining concerns. Equally noteworthy, federal agencies have worked with Ligado to ensure that the spectrum can be utilized and Ligado has specifically committed on-the-record to provide specific mitigation measures to protect U.S. government systems. Given the extraordinary efforts by all parties to resolve the issues presented, the time is ripe for the Commission to provide a final seal of approval and provide an additional pathway for 5G deployment.

With licensing hurdles cleared, Ligado would stand ready to further contribute to the highly competitive and innovative wireless ecosystem and provide new opportunities for connectivity for Americans across the country.

Sincerely,



Jonathan Adelstein  
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