



Microcom Design, Inc.

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Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of

Allocation and Service Rules for the
1675–1680 MHz Band

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NPRM Docket No. 19-116

Reply to Comments in for Docket No. 19-116

Microcom Design would like to reply to the comments made by Ligado Networks LLC in filing ID [10621258324775](#). The comments made by Ligado intentionally misrepresent the non-federal users of GOES products as “eavesdroppers” while in fact they are partners. NOAA encourages non-federal users to install transmitters and receivers that use the GOES system. This benefits the non-federal users by allowing them the use of the GOES system to relay their data and directly receive it without the need for an internet connection. The benefit to the federal users is that they can access this data from the non-federal stations. These non-federal users are not in the shadows “listening in on NOAA’S band”. In fact they are active participants in weather data collection.

If Ligado is allowed to force non-federal receive sites to shut down due to overpowering interference Ligado will destroy the infrastructure used by both federal and non-federal organizations to receive alerts of impending natural disasters. When the non-federal receive sites are disrupted by the proposed interference there will no longer be any incentive for non-federal use of GOES. Those non-federal sites NOAA currently rely on for data will cease to operate. Extra resources will need to be dedicated for measurements that were previously made by non-federal sites.

Respectfully,

Microcom Design, Inc.

Brett H. Betsill
Owner and President

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Engineered Solutions