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July 23, 2019

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

Re: Notice of *Ex Parte* Presentation, WT Docket No. 19-116; IB Docket No. 11-109; IBFS File Nos. SES-MOD-20151231-00981, SAT-MOD-20151231-00090, and SAT-MOD-20151231-00091

Dear Ms. Dortch:

On July 19, 2019, Doug Smith, Valerie Green, and Maqbool Aliani with Ligado Networks LLC (“Ligado”) and the undersigned met with Ron Repasi and Paul Murray with the Office of Engineering and Technology, Jim Schlichting and Karl Kensinger (by phone) with the International Bureau, and Charles Mathias with the Wireless Telecommunications Bureau. The parties discussed the Section 7 petition that Ligado filed last month urging prompt action on the company’s pending license modification applications. In that context, Ligado’s representatives explained how the record before the Commission regarding these license modification applications is complete and fully supports approval, and therefore the Commission should act immediately to approve these applications which have now been pending for more than three years.

Ligado’s representatives reiterated the company’s commitment to mitigate any impact on U.S. government GPS devices, including the repair or replacement of such devices as necessary, both pre- and post-deployment. With respect to commercial use of GPS, the parties reviewed the co-existence agreements with the major GPS device manufacturers (agreements which resulted in the development of parameters proposed in the applications), the thousands of hours of testing at NASCTN, and Ligado’s adoption of the power level recommended in the DOT Report for the lower downlink channel (1526-1536 MHz) — all of which confirm and ensure that Ligado’s terrestrial operations will not cause harmful interference to commercial GPS devices. Moreover, the record demonstrates that GPS is fully protected at 1 dB C/N₀ level in the spectrum band allocated to GPS/GNSS (1559-1610 MHz), that no parties express concerns about an impact to GPS devices from the proposed operations in the uplink bands at 1627.5-1637.5 and 1646.5-1656.5 MHz, and that, in the lower downlink, Ligado’s proposal affords GPS protection from harmful interference and creates a 23 megahertz guard band for GPS.

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As documented in the Section 7 petition, Ligado is working closely with major 5G equipment suppliers Ericsson and Nokia to prepare to deploy 5G IoT technology, and the representatives concluded by urging the Commission to approve the license modification applications to unleash 40 megahertz of mid-band spectrum for 5G services that can truly meet the critical needs of industrial users and advance the Internet of Things.

Please direct any questions to the undersigned.

Sincerely,

/s/ Gerard J. Waldron
Gerard J. Waldron
Counsel to Ligado Networks LLC

cc: Ron Repasi
Paul Murray
Jim Schlichting
Karl Kensinger
Charles Mathias