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July 26, 2019

VIA ECFS AND IBFS

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

Notice of Oral Ex Parte Communication

Re: *LightSquared Request to Modify Its ATC Authorization, IB Docket No. 12-340; IBFS File Nos. SAT-MOD-20120928-00160; SAT-MOD-20120928-00161; SAT-MOD 20101118-00239; SES-MOD-20121001-00872; LightSquared Technical Working Group, IB Docket No. 11-109; DA 16-442; and*

FCC Seeks Comment on Waiver of Part 25 Licensing Requirement for Receive-Only Earth Stations Operating with the Galileo Radionavigation-Satellite Service; IB Docket No. 17-16.

Dear Ms. Dortch:

On July 24, 2019, James Kirkland, Senior Vice President and General Counsel of Trimble Inc. ("Trimble"), and the undersigned counsel met with Paul Murray of the Office of Engineering and Technology, James Schlichting and Karl Kensinger of the International Bureau, and Charles Mathias of the Wireless Telecommunications Bureau regarding the above-referenced matters.

We observed that Trimble has supported grant of the above-referenced applications for modification, except that it has not supported use of the 1526-1535 MHz band as described in those applications.^{1/} For that, and other spectrum nearby to frequencies designated for the global positioning system (1559-1610 MHz), the Commission should continue to evaluate proposals based on whether the proposed service would result in a 1 dB increase in the noise floor (*i.e.*, whether there is a 1 dB decrease in the Carrier-to-Noise Power Density Ratio ("C/N₀")).

We also commended the Commission's action allowing U.S. devices to receive the E1 and E5 signals transmitted by the Galileo Global Navigation Satellite System ("GNSS"). We expressed concern about the Commission's rejection of the European Union ("EU") request that the Commission also permit devices to operate with the Galileo E6 signal. Consistent with the Petition for Reconsideration and Clarification filed by the GPS Innovation Alliance, of which

^{1/} See Comments of Trimble Navigation Limited, IB Docket No. 12-340, *et al.*, at 2 (filed May 23, 2016); Reply Comments of Trimble Navigation Limited, IB Docket No. 12-340, *et al.*, at 2 (filed June 21, 2016).

Trimble is a member,^{2/} we suggested that instead of rejecting the EU request, the Commission hold this request in abeyance until such time as it is able to evaluate whether the potential terrestrial services in the 1300-1350 MHz band, adjacent to the E6 signal, would affect devices capable of receiving the E6 signal.

Pursuant to the Commission's rules, a copy of this letter is being sent to Commissioner O'Rielly and all Commission staff with whom we met.

Sincerely,

/s/ Russell H. Fox

Russell H. Fox

cc: (each by e-mail)

Paul Murray
James Schlichting
Karl Kensinger
Charles Mathias

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^{2/} See Petition for Reconsideration and Clarification, IB Docket No. 17-16 (filed Dec. 17, 2018).