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December 12, 2018

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 December 10, 2018, James Kirkland, Senior Vice President and General Counsel of Trimble Inc. ("Trimble"), James Derderian of Stanton Park Group LLC, and the undersigned counsel met with Commissioner Michael O'Rielly and his Legal Advisor Erin McGrath regarding the above-referenced matters.

On the same day, Mr. Kirkland and I met with the following Commission staff:

Julius Knapp (OET)	Troy Tanner (International Bureau)
Paul Murray (OET)	Merissa Velez (International Bureau)
Nese Guendelsberger (International Bureau)	Jose Albuquerque (International Bureau)
Michele Wu-Bailey (International Bureau)	Charles Mathias (WTB)

We stated that we are pleased to continue to work with Commission staff, if required, to address any regulatory matters regarding operation of the system proposed by (what is now) Ligado Networks. We also commended the Commission's recent 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. 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. Finally, we suggested that the Commission clarify the status of devices receiving signals from other foreign satellites, noting that

many devices receive signals from multiple GNSS constellations and that these devices often cross international borders.

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

Sincerely,

/s/ Russell H. Fox

Russell H. Fox

cc: (each by e-mail)
Commissioner Michael O'Rielly
Erin McGrath
Julius Knapp
Paul Murray
Nese Guendelsberger
Michele Wu-Bailey
Troy Tanner
Merissa Velez
Jose Albuquerque
Charles Mathias