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Gerard J. Waldron

Covington & Burling LLP
One CityCenter
850 Tenth Street, NW
Washington, DC 20001-4956
T +1 202 662 5360
gwaldron@cov.com

December 30, 2015

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

Re: *Ex parte* presentation in IB Docket No. 12-340; IBFS File Nos. SAT-MOD-20101118-00239; SAT-MOD-20120928-00160; SAT-MOD-20120928-00161; SES-MOD-20121001-00872

Dear Ms. Dortch:

On December 12, 2015, a group of aviation companies and associations referred to as the “Joint Aviation Parties”¹ submitted a letter to the Commission regarding a GPS receiver test plan prepared by Roberson and Associates on behalf of New LightSquared. The most recent version of this test plan was filed on September 30, 2015 in the above proceeding. New LightSquared submits this letter to inform the Commission that the Joint Aviation Parties’ concerns about testing certified aviation GPS receivers have already been addressed.

New LightSquared assures the Commission, and the Joint Aviation Parties, that aviation safety is of paramount concern to the company. Coexistence of terrestrial broadband and GPS must, necessarily, ensure that use of GPS by certified aviation receivers is in no way impaired and is consistent with established safety requirements.

That is why New LightSquared agrees with the Joint Aviation Parties that certified aviation GPS receivers must be judged by reference to the RTCA Minimum Operational Performance Standards (“MOPS”) for immunity to interference from adjacent band signals, as such standards are incorporated into Technical Standard Orders issued by the Federal Aviation administration (“FAA”). Accordingly, Roberson and Associates has already removed certified

¹ The Joint Aviation Parties are Aviation Spectrum Resources, Inc. (ASRI), Airlines for America (A4A), the Bristow Group Inc. (Bristow), the Cargo Airline Association (CAA), Federal Express (FedEx), Helicopter Association International (HAI), the International Air Transport Association (IATA), the National Air Transportation Association (NATA), Rockwell Collins Information Management Services (Rockwell-Collins IMS), and United Parcel Service (UPS).

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aviation GPS receivers from its test plan.² This change will be reflected in the final test plan, which will be filed with the Commission in early 2016.

Separately, New LightSquared will shortly file changes to its pending applications before the Commission to incorporate the power and out of band emissions limits established by its recent coexistence agreements with Deere & Company and Garmin.³ **As the Commission considers implementation of these limits**, New LightSquared will continue its close engagement with RTCA and the FAA on these matters, and will continue to work cooperatively with the aviation community in the application and development of standards for certified aviation GPS receivers.

Respectfully submitted,

/s/ Gerard J. Waldron _____

Gerard J. Waldron

Ani Gevorkian

Counsel to New LightSquared

² Due to LightSquared's emergence from bankruptcy on December 7, 2015 and the pace of recent activities, it appears that this development was not known to the Joint Aviation Parties. New LightSquared regrets any oversight on its part that contributed to this situation.

³ See Letter from Gerard J. Waldron to Marlene H. Dortch, IB Docket No. 12-340 (Dec. 8, 2015) (coexistence agreement with Deere); Letter from Gerard J. Waldron to Marlene H. Dortch, IB Docket No. 12-340 (Dec. 17, 2015) (coexistence agreement with Garmin); see also P. Kirby, *LightSquared, Trimble Plan "Compromise Approach" to Resolve Issues*, TRDAILY, Dec. 15, 2015.