

# COVINGTON

BEIJING BRUSSELS LONDON LOS ANGELES  
NEW YORK SAN FRANCISCO SEOUL  
SHANGHAI SILICON VALLEY WASHINGTON

**Gerard J. Waldron**

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

January 22, 2016

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

**Re: Written *ex parte* presentation in RM-11681; IB Docket No. 12-340; IB Docket No. 11-109; IBFS File Nos. SAT-MOD-20120928-00160; SAT-MOD-20120928-00161; SES-MOD-20121001-00872**

Dear Ms. Dortch:

On January 20, 2016, the undersigned, counsel to New LightSquared LLC (“New LightSquared”), met with Louis Peraertz, Senior Legal Advisor to Commissioner Clyburn. During the meeting, we discussed the settlement agreements New LightSquared reached with Deere & Company and Garmin International, Inc. (the “Coexistence Agreements”) as well as the license modification applications New LightSquared filed to fulfill the conditions subsequent in the Coexistence Agreements. In particular, the parties reviewed the power band limits and out of band emissions limits set forth in the Coexistence Agreements and requested in the license modification applications. Aviation concerns will be addressed by New LightSquared’s proposal in the license modification applications that the Commission embed in the license for 1526-1536 MHz the condition that the licensee operate in deference to FAA standards.

The parties also discussed the need for the Commission to move forward with plans to reallocate for shared commercial use and auction the band of spectrum at 1675-1680 MHz, which is currently being used by the National Oceanic and Atmospheric Administration. The Commission’s licensing, service rules, and auction process can address many of the concerns related to the reallocation and auctioning of this band. The parties stressed the importance of this band to the successful operation of New LightSquared’s proposed broadband network in light of the fact that New LightSquared agreed, as part of the Coexistence Agreements, to file a request with the Commission to relinquish permanently the use of the 1545-1555 MHz band for any terrestrial use—and requested in the license modifications applications that its licenses be modified accordingly.

**COVINGTON**

Ms. Marlene H. Dortch  
January 13, 2016  
Page 2

Please direct any questions to the undersigned.

Sincerely,

*/s/ Gerard J. Waldron*

Gerard J. Waldron  
*Counsel to New LightSquared LLC*

cc: Louis Peraertz