



March 7, 2016

Via Electronic Filing

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

Re: Written Ex Parte Communication
LightSquared Request to Modify Its ATC Authorization, IB Docket No. 12-340;
LightSquared Technical Working Group Report, IB Docket No. 11-109

Dear Ms. Dortch:

CTIA® has long been an advocate of measures that bring new spectrum to market and promote innovation, investment, and competition in the mobile broadband marketplace. To that end, CTIA strongly supports initiatives by the Administration, Congress, the Commission, and stakeholders to identify and allocate more spectrum to help accommodate the explosive growth in demand for mobile broadband. Maintaining U.S. leadership in the global marketplace, advancing the U.S. economy, and meeting consumers' growing demand for broadband services can only be accomplished by bringing more spectrum to market.

In recent weeks, Ligado Networks (formerly LightSquared) has made a series of filings with the FCC. These include coexistence agreements with major GPS manufacturers, as well as modification applications in which Ligado has proposed to abide by new power limits and other conditions while permanently abandoning terrestrial use rights to 1545-1555 MHz, the Ligado spectrum closest to GPS. In exchange, Ligado is asking the Commission to make the 1675-1680 MHz band available via auction. Ligado has asked the Commission to issue a public notice seeking comment on the coexistence agreements, the modification applications, and reports examining the potential for commercial sharing of 1675-1680 MHz with federal weather satellites. According to Ligado, the comment cycle in response to that public notice will give the Commission the information it needs to initiate a rulemaking to reallocate 1675-1680 MHz for shared commercial use; to write the proposed service rules for sharing that band with government users; and to establish a process to auction the spectrum by the end of the year.¹

¹ See, e.g., Letter from Gerald J. Waldron, Counsel to LightSquared, to Marlene H. Dortch, Secretary, FCC, IB Dkt. Nos. 12-340 & 11-109 (Dec. 31, 2015). Ligado has also withdrawn a



The 1675-1680 MHz proposal by Ligado represents an opportunity to repurpose more spectrum for mobile broadband use and spur additional investment, innovation, and competitive forces in the broadband marketplace. CTIA thus supports Ligado's request for a public notice, followed by a notice of proposed rulemaking, seeking comment on repurposing the 1675-1680 MHz band and making it available via auction for commercial use for either exclusive use or on a shared basis with government operations. Of course, there are other issues directly relevant to Ligado's plans, including issues concerning interference to GPS, and as part of the Commission's inquiry it should seek public comment on whether those interference concerns have been adequately addressed.

Access to new spectrum bands can promote more innovation, investment, and competition in the broadband marketplace, all to the benefit of U.S. consumers and the U.S. economy. CTIA therefore supports Ligado's efforts to repurpose the 1675-1680 MHz band and urges the Commission to commence those proceedings necessary to address its proposal.

Sincerely,

/s/ Scott K. Bergmann

Scott K. Bergmann
Vice President, Regulatory Affairs
CTIA®

cc: Paige Atkins, Associate Administrator,
Office of Spectrum Management, NTIA

2012 petition for rulemaking concerning the 1526-1536 MHz band, in light of its proposal to use that spectrum subject to new power limits and a condition designed to protect aviation interests. See Letter from Gerald J. Waldron, Counsel to LightSquared, to Marlene H. Dortch, Secretary, FCC, IB Dkt. Nos. 12-340 & 11-109, ET Dkt. No. 10-142 (Feb. 8, 2016).