

May 23, 2016

Ms. Marlene S. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Room 2-B450
Washington, D.C. 20554

Re: IB Docket No. 11-109; IB Docket No. 12-340

Dear Ms. Dortch:

Aerospace and Flight Test Radio Coordinating Council, Inc. (“AFTRCC”) and Ligado Networks LLC (“Ligado”) are pleased to advise the Commission that they have reached an agreement for coordination of Ligado base stations with aeronautical mobile telemetry (“AMT”) receive sites.

As the Commission may be aware, AFTRCC maintains a current database of AMT receive sites, government and non-government. These sites are crucially important to aerospace development because aircraft undergoing flight testing transmit results of measurements such as engine temperature, fluid pressure, control surface strain gauges, and many other functions back to AMT sites. AMT data is thus essential for the safety of pilots and persons on the ground during flight test activities as it is the critical source of real-time measurement and status information transmitted from airborne vehicles during live tests of manned and unmanned aircraft.

AFTRCC utilizes its database of AMT sites, as well as state-of-the-art software tools, to analyze proposed broadband deployments in spectrum adjacent to AMT and provide advisory recommendations to affected AMT operators and government area frequency coordinators (“AFCs”). The AFCs and flight test operators have the final ‘say’ to concur/non-concur with those recommendations. Under the terms of the agreement, AFTRCC will utilize the same database and tools to analyze, and provide recommendations on, proposed Ligado deployments.

The coordination agreement addresses concerns registered by AFTRCC in its prior filings in these proceedings; namely, that Ligado deployments in the band 1526-1536 MHz pose a risk of harmful interference to sensitive AMT facilities operating in 1435-1525 MHz. AFTRCC further stressed that the Commission should not lose sight of this risk as it addresses potential interference to GPS receivers on the other side of Ligado’s spectrum. AFTRCC and Ligado are pleased that, as a result of their discussions and technical exchange, they have arrived at an agreement to address that risk.

For its part, Ligado will benefit materially from a streamlined coordination process for its operations near-adjacent to AMT. The agreed-upon process holds the potential to significantly

facilitate the efficient deployment of additional broadband facilities. No less importantly, the agreement resolves one of the important policy issues affecting Commission action on Ligado's modification applications.

This letter relates only to the resolution of issues related to AMT, however, and should not be construed as addressing in any way issues concerning potential interference to GPS.

Any questions regarding this matter may be addressed to the undersigned.

Thank you.

Respectfully submitted,



Dan Robinson
WRK

Dan Robinson
President
Aerospace and Flight Test Radio
Coordinating Council, Inc.



Jeffrey Carlisle
Executive Vice-President
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