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Federal Communications Commission
Reference: Dockets No. 11-109 and No. 12-340

To whom it may concern,

Stephen M. Browne wishes to file a response to the comments filed by NovAtel Inc. ("NovAtel") through its counsel by letter dated May 19, 2016.

Stephen M. Browne is fully supportive of the comments made by NovAtel in response to Ligado Network LLC's proposed new applications to modify the ancillary terrestrial component of its L-band Mobile Satellite Service Networks.

Stephen M. Browne agrees with all of the points made by NovAtel in its filing.

In particular, Stephen M. Browne strongly agrees with NovAtel that the existing 1-dB metric for GPS interference criteria is appropriate. The metric has developed as an agreed upon standard that interference tolerance should be limited to a received interference signal power level that causes no more than 1-dB degradation in the received C/No level.

As a user of GPS products, Stephen M. Browne requires high accuracy positioning in its applications using GPS receivers and we share NovAtel's concern with the conclusion in the Robertson & Associates study that suggest there is no meaningful correlation between a 1-dB change in GPS performance. We agree the GPS L-1 signal is very weak and has a number of vulnerabilities with low level interference and cause disruption to both pseudo range and carrier phase. We are in complete agreement with NovAtel that any interference must not exceed 1-dB degradation and receive C/No.

We fully support the position of NovAtel and the technical points which have been raised by them.

Yours truly,

A handwritten signature in blue ink, appearing to read "Stephen M. Browne".

Stephen M. Browne
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