



June 3, 2016

BY ECFS and Overnight Courier

Federal Communications Commission
445 12th Street SW
Washington, DC 20554
United States of America

Attention: Marlene H. Dortch, Secretary

Dear Ms. Dortch:

**Re: Written *ex parte* presentation in IB Docket No. 11-109; DA 16-442;
IB Docket No. 12-340 (Comments Sought on Ligado's Modification Applications);
IBFS File Nos. SES-MOD-20151231-00981; SAT-MOD-20151231-00090 and
SAT-MOD-20151231-00091**

Clarification of Comments filed May 19, 2016

NovAtel Inc. ("**NovAtel**") seeks to clarify its comments to Ligado Networks LLC's ("**Ligado**"), (formerly New LightSquared LLC and its subsidiary, LightSquared Subsidiary LLC), Licence Modification Applications filed on May 19, 2016.

Novatel commented that no one from Ligado or Roberson & Associates contacted them to confirm how the SMART6 or the SMART6L receiver may be utilized nor if the products were representative of all NovAtel product. NovAtel acknowledges that Ligado's Mr. Smith and NovAtel's Mr. Ritter did have a general telephone discussion on April 29, 2016 wherein Mr. Ritter indicated that he was waiting for the test results. Mr. Ritter promised to respond to Mr. Smith with any concerns that NovAtel might have.

On May 16, 2016, subsequent to the release of the Roberson & Associates report, Mr. Ritter contacted Mr. Smith by email to advise that NovAtel had read the report, believed the tests were flawed and were planning to file comment. Mr. Ritter also inquired if Roberson & Associates has tested a SMART6 or a SMART6L receiver. Mr. Smith responded by email that same day confirming that the Roberson & Associates report listed the wrong NovAtel product.

The point NovAtel makes in its May 19, 2016 comments is simply that no one from Ligado or Roberson & Associates contacted them prior to the testing to confirm whether the SMART6 or SMART6L receiver was the most appropriate for testing and whether it was representative of all NovAtel product.

Comments on Ligado's May 23, 2016 Filing¹

Ligado makes the following statement at page 20 of its comments:

High precision devices represent a much smaller segment of the GPS market, although high precision devices can be more vulnerable to interference since many of these devices have relatively wide RF front-end bandwidths as they have been designed to receive an MSS augmentation signal in the 1525-1559 MSS band...

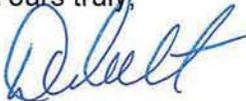
⁴³ These wide RF front-end receivers are no longer necessary since Ligado has committed to provide this augmentation signal in the 1555 MHz band and higher, which provides sufficient separation between any MSS augmentation and any terrestrial use of the L-band.

NovAtel submits that Ligado stating that RF front-ends do not need to support 1525-1559 MHz is incorrect. Ligado may have committed to provide the augmentation signal at 1555 MHz and higher for use in North America by its customers, but the major global MSS provider Inmarsat, still requires all receivers to receive the entire MSS spectrum from 1525-1559 MHz. NovAtel states that even if the current Inmarsat requirements were modified in the future, millions of currently fielded high precision receivers produced by all major manufacturers would have to be modified.

NovAtel maintains the comments it made in its May 19, 2016 letter filed by counsel.

Pursuant to section 1.1206(b)(2) of the Commissions' Rules, an electronic copy of this letter is being filed in the above-referenced proceedings.

Yours truly,



D. E. (Buster) Moulton, CA, CPA
Chief Financial Officer
NovAtel Inc.

¹ Comments of Ligado Networks LLC, *In the Matter of Comments Sought on Ligado's Modification Applications*, IB Docket 11-109, May 23, 2016.