

## **Annex C**

### **Comments of the U.S. GPS Industry Council on the Proposal of LightSquared Subsidiary LLC for a new future agenda item for WRC-15 in Document IWG-4/99**

The U.S. GPS Industry Council (“Council”) expressed its opposition during the 3 March 2011 meeting of IWG-4 to the inclusion in any U.S. proposal for a future WRC agenda item of the consideration of a possible change to the mobile-satellite service (“MSS”) allocations at 1525-1559 MHz and/or 1626.5-1660.5 MHz to accommodate the MSS ancillary terrestrial component (known in ITU terms as Complementary Ground Component or “CGC”). At that point, the LightSquared proposal called for WRC consideration of CGC on “a co-primary basis” with the MSS; a subsequent revision to the agenda item proposal and associated resolution removed specific reference to the possibility of a “co-primary” allocation, but retains reference to the possibility of future allocations to support implementation of CGC in the L-band frequencies authorized for LightSquared’s MSS system.

The Council maintains that the agenda item proposed in Document IWG-4/99r1 should not go forward as a U.S. proposal. There is no basis for changing the allocation tables in the L-band MSS frequencies (either for a primary or a secondary mobile allocation) to accommodate CGC. LightSquared’s license is for a domestic MSS system, and its authorization to operate ATC is limited to the United States. This is a domestic licensing matter that has been/is being addressed by the FCC without the need for changes to ITU regulations. There are serious unresolved technical questions about whether non-integrated mobile stations can operate in the LightSquared MSS spectrum without causing harmful interference to MSS in the same band or to radionavigation satellite-service systems operating in the 1559-1610 MHz band. Until these questions are answered objectively, the U.S. cannot put forward to the international community the notion that a mobile allocation of any kind is acceptable in the LightSquared MSS bands.