



## CONFIDENTIAL TREATMENT REQUESTED

October 3, 2011

Julius Knapp, Chief  
Office of Engineering and Technology  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Re: LightSquared Subsidiary LLC  
IB Docket No. 11-109  
IBFS File No. SAT-MOD-20101118-00239

Dear Mr. Knapp,

At your request,<sup>1</sup> LightSquared Subsidiary LLC (“LightSquared”), on behalf of the Working Group established in the FCC Order DA 11-133 (January 26, 2011), previously submitted a “Device Code Key” as a supplement to the Final Report of the Working Group (June 30, 2011) (“Final Report”), and requested confidential treatment of this document.<sup>2</sup> Subsequently, the Office of Engineering and Technology (“OET”) requested LightSquared’s consent to provide the Device Code Key to the National Telecommunications and Information Administration (“NTIA”).<sup>3</sup>

In a separate letter dated today LightSquared is consenting to OET’s request, based on understandings as to protections that will apply and subject to a request that an updated version of the Device Code Key be used. LightSquared herein provides the updated Device Code Key. This updated document includes the device code for a manufacturer that had not previously consented to disclosure of its information, but now has. It also deletes the device code for a manufacturer that objects to the provision of its code to NTIA. Only the updated version of the Device Code Key should be provided to NTIA.

---

<sup>1</sup> See Letter to Jeffrey Carlisle, Executive Vice President, LightSquared Subsidiary LLC, and Charles R. Trimble, Chairman, U.S. GPS Industry Council, from Julius P. Knapp, Chief, Office of Engineering and Technology, FCC (Aug. 10, 2011).

<sup>2</sup> Letter from Jeffrey Carlisle, Executive Vice President, LightSquared Subsidiary LLC, to Julius Knapp, FCC, IB Docket No. 11-109, IBFS File No. SAT-MOD-20101118-00239 (Aug. 15, 2011) (requesting confidential treatment).

<sup>3</sup> Letter to Jeffrey Carlisle, Executive Vice President, LightSquared Subsidiary LLC, from Julius P. Knapp, Chief, Office of Engineering and Technology, FCC, Re: NTIA Request for Confidential Information (Sept. 22, 2011).

Pursuant to Section 0.459(b) of the Commission's rules,<sup>4</sup> and consistent with and for the reasons set out in LightSquared's August 15, 2011 filing in this docket, LightSquared requests confidential treatment of the updated Device Code Key.<sup>5</sup>

Please direct any questions to the undersigned.

Respectfully submitted,

/s/ Jeffrey Carlisle

---

Executive Vice President  
Regulatory Affairs & Public Policy  
703-390-2001 (office)  
571-296-7780 (mobile)  
[Jeff.Carlisle@lightsquared.com](mailto:Jeff.Carlisle@lightsquared.com)

cc: [IB-SATFO@fcc.gov](mailto:IB-SATFO@fcc.gov)  
Ronald Repasi

Enclosure (Confidential Treatment Requested)

---

<sup>4</sup> 47 C.F.R. § 0.459(b).

<sup>5</sup> Because the entire Device Code Key contains sensitive information regarding the identity of the devices and device manufacturers associated with the findings in the Final Report, confidential treatment is sought for the entire document and no redacted copy is being submitted. 47 C.F.R. § 0.549(a)(2).