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February 2, 2012

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: LightSquared Petition for Declaratory Ruling
IB Docket No. 11-109; ET Docket No. 10-142

Dear Ms. Dortch:

SI Wireless, LLC (“SIW”) submits this letter in support of the Petition for Declaratory Ruling filed by LightSquared Inc. on December 20, 2011 and placed on public notice by the Commission on January 27, 2012.

LightSquared proposes to operate its planned 4G LTE wireless system on a wholesale basis. SIW expects that LightSquared’s business approach will promote competition significantly by enhancing the ability of regional wireless service providers such as SIW to offer wireless services nationwide as consumers now demand of their carriers.

SIW was formed in 2009 to provide high quality wireless voice, data and broadband services to portions of Illinois, Kentucky and Tennessee that were historically underserved. Since June 2011, SIW launched service in approximately 61 counties, with plans to expand service to additional areas as opportunities arise. As a regional carrier SIW must rely on the networks of national wireless carriers for roaming services in order to offer service that meets the needs of customers who travel outside of areas where SIW holds spectrum authorizations. The prospect of access to spectrum through the Lightwave network is of substantial interest to SIW because it will provide an additional and competitive means for SIW to serve its current and future customers who travel outside of the company’s service area.

Lightwave’s wholesale-only model will allow LightSquared’s partners to overcome the high barriers to market entry—including potentially prohibitive network deployment and roaming costs, as well as spectrum scarcity—that could otherwise unduly raise their operating costs, or preclude them from operating altogether. SIW has immediate interest in making use of LightSquared’s wholesale services. By affirming LightSquared’s rights as described in the Petition, the Commission would facilitate our ability to deliver the tangible benefits of more robust competition to consumers in the form of higher quality service, lower rates, and expanded voice and broadband service options.

At the same time, granting LightSquared's Petition would reinforce the integrity of the Commission's rules, and provide the regulatory certainty necessary for companies such as SIW and LightSquared to attract investment and continue developing innovative communications solutions that truly benefit consumers. It bears emphasis that LightSquared's Petition does *not* ask the Commission to waive its rules or afford LightSquared special treatment in any way. Rather, the Petition merely asks the Commission to affirm its *existing* legal and policy framework for spectrum licensing and usage rights, which (i) has been in place for decades; (ii) formed the basis for the technical standards developed cooperatively by LightSquared and the commercial GPS industry almost a decade ago; and (iii) has been relied upon by LightSquared and its investors, customers, and others throughout the implementation of the LightSquared network.

SIW expects that hundreds of millions of American consumers would benefit from the greater competition that would be made possible by LightSquared's network—consistent with the objectives of the *National Broadband Plan*. Accordingly, I urge the Commission to grant LightSquared's Petition on an expedited basis.

Respectfully submitted,

SI WIRELESS, LLC

/s/ Terry Addington

By: _____
Chief Executive Officer