



February 7, 2012

The Honorable Julius Genachowski, Chairman
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: IB Docket 11-109; ET Docket 10-142

Dear Chairman Genachowski:

The Ohio Association of Convention and Visitors Bureaus is a statewide trade association composed of the Chief Executive Officers of the destination marketing organizations operating within Ohio's Counties and Cities. Our membership reaches all corners of the state. We are critical to the economic development in Ohio as the travel and tourism industry is the third largest employer in our State.

I write today regarding LightSquared's Petition for Declaratory Ruling. While I support LightSquared's proposal to expand wireless broadband connectivity in rural America, bring satellite connectivity to consumers and increase competition in the wireless marketplace, I agree that the Federal Communications Commission should clarify the regulatory rights of LightSquared and other spectrum users impacted by the company's plans to deploy a 4G LTE network in its licensed L-band spectrum.

Not surprisingly, as entities that promote travel and tourism, many of the individuals that come to Ohio and travel our state rely upon GPS devices. It is in our best interest that any solution from LightSquared also allow for GPS navigation systems to be able to operate correctly as well. However, it is disconcerting that GPS device makers sold GPS devices to seek GPS signals outside of the allocated GPS band without protecting devices from authorized uses of those non-GPS bands of spectrum, such as LightSquared's proposal for terrestrial use. It is clear, as several GPS manufacturers have shown recently that it is possible to design GPS devices to be both high functional and protected from LightSquared's terrestrial transmissions using components that are in the marketplace today.

As a matter of public policy, LightSquared offers the unique ability to bring quickly online an efficient nationwide 4G wireless broadband network that will help our country avoid a spectrum crisis that is leading to soaring consumer costs, worse wireless service, increased flight of technology-related investment to other countries with better wireless infrastructure, and an increased digital divide between haves and have-nots.

Such development is critical to Ohio as many of the areas of our State that have the greatest broadband access issues are now experiencing some of the largest need as companies have begun exploring our shale areas for gas exploration. This explosion of jobs in Ohio means an already weak system is stressed further; or, unfortunately, the total lack of a broadband system is all the more noticeable.

LightSquared's sustainable wholesale-only business model will increase competition in the mobile broadband market, leading to lower consumer prices and increased access to services and applications via the mobile Internet. As the Computer and Communications Industry Association stated, LightSquared's proposed network will "spur innovation, economic growth, and job creation" and "lead to the entry of numerous new competitors".

In addition to examining the rules that support LightSquared's case in its Petition for Declaratory Ruling, I encourage the FCC to weigh these policy matters as it considers LightSquared's authorization to deploy an integrated wireless broadband network.

Sincerely,



Debbie Stamper

President, Ohio Association of Convention and Visitors Bureaus

cc: Assistant Secretary Lawrence Strickling, NTIA