

February 14, 2012

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

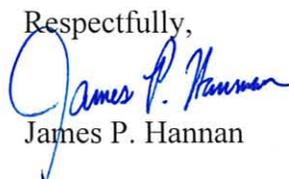
Re: IB Docket No. 11-109; Petition for Declaratory Ruling

Dear Chairman Genachowski:

As a recreational boater and the owner of several businesses in an area of avid recreational boaters, I support LightSquared's proposal to deploy a unique telecommunications network integrating satellite and high-speed mobile broadband transmissions. Currently, satellite communications service is largely in the domain of public safety personnel because of the high costs associated with a small subscriber base and the significant costs of deploying and operating a communications satellite. LightSquared's unique innovation in re-using its licensed spectrum to also provide ground-based mobile broadband service will enable the economics necessary to bring critical satellite communications service anywhere under the American sky to everyday consumers and maritime users such as myself. Moreover, LightSquared's innovations will enable both satellite and mobile broadband connectivity in handsets the size of today's cellphones.

Let me be clear that I believe maritime GPS service is immensely useful. While I support the availability of the GPS system for all users, it is critically important to separate the government's provision of GPS from the makers of GPS devices. GPS device makers did not have to design GPS devices, maritime or otherwise, to seek for the GPS signal outside of GPS-allocated spectrum. While GPS device makers may argue that seeking the satellite GPS signal outside of the GPS band is necessary for precision purposes, it is incumbent on device makers to ensure that these forays into non-GPS spectrum are protected from interference. Whether it is LightSquared's proposed network or a radio broadcasting tower, GPS makers should provide consumers with hardened GPS devices. As GPS devices makers Javad GNSS and Hemisphere GPS have independently developed and tested, it is possible to design such devices so that they are not only compatible with LightSquared's network, but also cheaper and more reliable.

I want to be able to access both LightSquared's unique satellite-terrestrial service and GPS services. However, should maritime GPS devices malfunction due to their infringement on LightSquared spectrum, GPS device makers should conduct a recall of their devices and insert the components necessary to enable compatibility between GPS services and any services provided in non-GPS spectrum.

Respectfully,

James P. Hannan

cc: Asst. Secretary Strickling, NTIA