

Sara Davis  
1902 Kavanaugh Boulevard, Apt. 2  
Little Rock, AR 72205

February 29, 2012

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

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

Dear Chairman Genachowski:

I work for a technological consulting company in Arkansas, and on a daily basis, we encounter clients who are inhibited by a lack of access to a strong, reliable mobile wireless network. Arkansas has great economic potential and numerous strong companies have invested in our state even amid the economic crisis. However, insufficient wireless broadband infrastructure continues to be a barrier in reaching our full economic potential and capitalizing on the innovation of our hardworking citizens. As a country, we need to out-innovate, out-build, out-compete and out-educate other countries, and we simply cannot do that without bringing more mobile broadband spectrum for mobile use to bear.

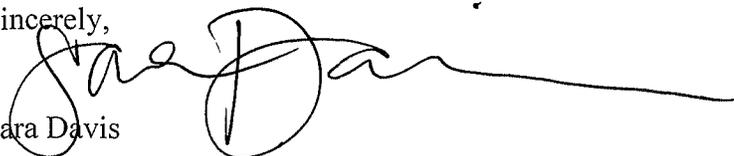
Despite the interference issues raised by GPS device makers, it is important that we not impede innovation, but encourage it. The FCC should promote options that will allow unused spectrum for mobile broadband purposes to operate alongside GPS device makers. I encourage the FCC to follow through on its commitment to make more efficient uses of suitable spectrum by expediting ideas such as LightSquared's proposal to deploy an integrated satellite-terrestrial network using its licensed L-band spectrum. Over a decade of investment, including research, government authorizations, technology building, and purchasing a network, is behind LightSquared's proposal of bringing this suitable spectrum for mobile broadband use. However, the unlicensed and unauthorized GPS device makers who use this spectrum have raised complaints to prevent the multi-faceted benefits of this network from reaching Arkansans and people throughout the country.

While I urge the FCC to mediate the most economically efficient and technically feasible solutions enabling co-existence between GPS devices and LightSquared's network, I also believe it is in the best interest of all parties involved to explicitly delineate the spectrum usage rights afforded to both licensed and unlicensed users. If GPS device manufacturers believed they could provide better service by using spectrum outside of what is allocated for GPS uses, they should have designed them using technology that protects GPS users from potential interference. GPS makers should seek licenses from the FCC, as well as seek out technological options that will allow compatibility with their devices and LightSquared's network. If this is not the case, the FCC should explicitly state its alternative interpretation of the rules and acknowledge the potential negative impact such a decision would have on attracting the necessary capital to acquire and prepare spectrum for any future innovative use.

Thank you for considering my comments. It is imperative that the FCC gets this right and affirms the rule of law.

Sincerely,

Sara Davis

A handwritten signature in black ink, appearing to read 'Sara Davis', with a long horizontal flourish extending to the right.

CC: The Honorable Lawrence E. Strickling  
Assistant Secretary for Communications and Information  
National Telecommunications & Information Administration  
United States Department of Commerce  
1401 Constitution Ave.  
Washington, D.C. 20230