

March 14, 2012

SUBMITTED ELECTRONICALLY

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12TH Street, S.W.
Washington, D.C. 20554

Re: Comments on NTIA Letter Regarding LightSquared Conditional Authorization, FCC Docket 11-109, DA 12-214

Dear Ms. Dortch:

Thank you for the opportunity to comment on the proposal by the Federal Communications Commission (FCC), as described in its February 15, 2012, Public Notice, to withdraw the January 2011 conditional waiver granted to LightSquared by the FCC's International Bureau and to modify LightSquared's current satellite license so that it is prohibited from building a ground-based wireless network. The undersigned organizations represent farmers and agribusinesses engaged in or servicing precision agricultural practices in all 50 states. We strongly urge the FCC to adopt both proposals.

We urge the FCC to do so because of the overwhelming evidence that LightSquared's proposed ground-based network would cause severe interference to virtually all uses of GPS. High-precision GPS technology is vitally important to American agriculture, and would be gravely harmed by LightSquared's plans.

The benefits of high precision GPS to U.S. agriculture are immense and diverse. By enabling farmers to make precise applications for planting, irrigation, and crop protection, GPS technology has been responsible for remarkable growth in productivity, farm income, and improved environmental sustainability.

A recent economic study that reviewed crop yields from 2007-2010 found that use of precision GPS technology, at adoption rates of 60%, increased U.S. farm revenue by approximately \$20 billion per year, the equivalent of nearly 12 percent of total annual production. Moreover, according to the economic study, if adoption rates of GPS had been at full 100% utilization, the growth in farm revenue would have been nearly \$30 billion.

We understand the FCC's recommendations are based principally on reports from the National Telecommunications and Information Administration (NTIA), the agency responsible for federal spectrum use and policy. In turn, the NTIA relied on spectrum and GPS experts within the federal government, including the Federal Aviation Administration (FAA), to assess how LightSquared may affect GPS interests. The NTIA found that LightSquared's previously proposed network simply could not co-exist successfully with GPS devices. The FCC can and should rely on these assessments and remove the uncertainty regarding the potential harm to GPS devices.

Over the past year, LightSquared frequently made numerous claims that a solution to interference problems would be forthcoming, and even touted a prototype filter under development that it claimed would "solve" the problem of interference with high-precision GPS. LightSquared also claimed that using only some of its spectrum -- at least on a temporary basis -- would alleviate potential interference. According to the NTIA's analysis, none of these solutions together or separately would resolve the interference problems that LightSquared's network would create. It should now be utterly clear that LightSquared's network would be incompatible with U.S. agriculture use of high precision GPS.

We remain strong supporters of expanded broadband access in rural America. However, expanded broadband access cannot come at the expense of degraded access to high precision GPS for U.S. farmers.

Again, we urge the FCC to adopt without delay its February 15, 2012, proposal to withdraw the conditional waiver granted to LightSquared in January 2011 and to modify LightSquared's current satellite license so that it is prohibited from building a ground-based wireless network.

Thank you for your consideration.

Sincerely,

American Farm Bureau Federation
American Soybean Association
American Sugar Cane League
Association of Equipment Manufacturers
National Association of Wheat Growers
National Barley Growers Association
National Corn Growers Association
National Council of Farmer Cooperatives
National Potato Council
National Sunflower Association

US Canola Association

USA Dry Pea & Lentil Council

USA Rice Federation