



March 30, 2012

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

Re: LightSquared Public Notice Reply Comments
IB Docket No. 11-109

Dear Ms. Dortch:

On behalf of PNG Telecommunications, Inc. d/b/a PowerNet Global Communications (“PNG”), I am writing to urge the Federal Communications Commission (the “Commission”) to work with LightSquared in order to seek a solution to its planned terrestrial operations.

Without LightSquared’s wholesale model, PNG will not be afforded the opportunity to enter the wireless marketplace or allow us to offer affordable advanced wireless broadband service to our current market, rural markets or underserved markets. More specifically, this 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. By affirming LightSquared’s rights, 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.

It bears emphasis that LightSquared has not asked the Commission to waive its rules or afford LightSquared special treatment in any way. Rather, LightSquared is asking 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. By working with LightSquared and the NTIA to come up with a viable solution, the Commission would reinforce the integrity of its rules, and provide the regulatory certainty necessary for companies like PNG and LightSquared to attract investment and continue developing innovative communications solutions that truly benefit consumers. 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 work with LightSquared to find a solution to the issues outlined in the NTIA’s February 14th letter and rule in LightSquared’s favor so that LightSquared’s network can open up much needed spectrum and increase broadband access and lower costs for consumers.

Respectfully submitted,

A handwritten signature in black ink that reads "Bernie Stevens". The signature is written in a cursive, flowing style.

Bernie Stevens, CEO