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March 28, 2012

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

Re: IB Docket No. 11-109; Reply comments for Public Notice DA 12-214

Dear Chairman Genachowski:

I am writing today in reply to comments submitted by the National Public Safety Telecommunications Council ("NPSTC") and the Association of Public-Safety Communications-International, Inc. ("APCO"). As an elected official responsible for public safety in Monmouth County, New Jersey, I strongly disagree with the conclusions these organizations have made because their based on unsubstantiated premises. The Federal Communications Commission ("FCC") proposal to revoke both the January 2011 Waiver Order and the 2004 ATC authorization will ultimately harm public safety personnel moving forward and it is in the public interest for the FCC to instead continue finding a solution that will enable LightSquared to deploy its nationwide integrated satellite-terrestrial network.

Both NPSTC and APCO correctly raise the importance of Global Positioning System (GPS) services to public safety. Whether it is for e-911, support of dispatch operations or a host of other GPS-related applications, GPS has become a prevalent and critical tool to public safety programs. However, the FCC should make crystal clear that GPS applications, whether they are for public safety, military or commercial use, are **best served** by improvements in the reliability, security and cost-effectiveness of GPS receiver technology. If NPSTC and APCO truly want to protect public safety use of GPS signals, they should demand that GPS receiver manufacturers be required to sell GPS equipment that is protected from interference; a task that the GPS industry obstinately refuses to undertake because it believes that all operations in spectrum in and around GPS-allocated spectrum should not be used for anything other than low-powered satellite communications.

It should be noted that under the U.S. Table of Allocated Frequencies, **GPS is already allocated 217 MHz of prime spectrum** below 5.03 GHz for five dedicated GPS frequencies (L1 – L5). Should the FCC revoke LightSquared's 2011 Waiver Order and 2004 authorization, the FCC is protecting the GPS industry from selling interference-resistant receivers that more efficiently use 217 MHz of spectrum. Regrettably, the FCC's decision in this regard may have the opposite effect and encourage GPS manufacturers to develop and sell even more wide-open and poorly protected receivers –

so long as they can be assured that the Department of Defense and other GPS user groups will come to their aid when petitioning the FCC. In this particular case, the FCC is enabling GPS manufacturers to sell safety-of-life and critical public safety equipment that look at more than 160 MHz outside the dedicated GPS band containing the L1 frequency in an unprotected manner that is both spectrum-inefficient and irresponsible. As a matter of public policy, the FCC should be encouraging innovation and better GPS receiver design to enable more efficient use of spectrum; in this matter the public safety interests of more resilient and useful GPS functionality aligns with FCC policy to drive more efficient use of all spectrum. As such, NPSTC and APCO concerns regarding GPS interference are misdirected towards LightSquared's proposed network and should instead be focused on the root of any interference symptoms – GPS receiver design.

From a public safety perspective, LightSquared's proposed integrated satellite-terrestrial network offers capabilities that are both unique and much needed. Currently, satellite communications capabilities are limited to outdoor use and not as commonplace as they could be because of the large form factor and high costs associated with a small user-base. An integrated satellite-terrestrial network, particularly in the weatherproof L-band, would enable first responders to transition operations from outdoors to indoors seamlessly. Moreover, LightSquared's next-generation communications satellite would shrink the form factor of a satellite-capable phone down to the more portable size of a Smartphone, without an external antenna. Finally, LightSquared's proposal to wholesale integrated satellite-terrestrial service would greatly expand the user base, enabling lower subscription costs that would allow public safety agencies to either cut costs while adding functionality or add more critical redundancy into their communications systems. These significant benefits to public safety would be lost if the FCC revokes LightSquared's 2004 authorization.

Given the expediency of the FCC's mandate on LightSquared to build out a nationwide network by 2016, I urge the FCC to quickly find a solution that will enable public safety users to benefit LightSquared's unique integrated satellite-terrestrial network. Rather than revoke LightSquared's Waiver Order and 2004 authorization, I urge the FCC to explore the option of relocating LightSquared to alternative spectrum in which LightSquared can deploy its terrestrial network while also taking action to ensure that GPS equipment developers rapidly mitigate interference issues in non-GPS spectrum bands. Such a course of action would best serve the public, particularly public safety.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Shaw Galder". The signature is fluid and cursive, written in a professional style.

Sheriff – Monmouth County, NJ