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The Chief
International Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: INTERNATIONAL BUREAU INVITES COMMENT ON NTIA LETTER
REGARDING LIGHTSQUARED CONDITIONAL WAIVER**

IB Docket No. 11-109

On behalf of America 4G, Inc., I am writing to comment on a letter submitted by the National Telecommunications and Information Administration (NTIA) on February 14, 2012, concerning the results of additional government testing of the potential interference effects of communications equipment that LightSquared Subsidiary LLC (LightSquared) seeks authority to operate.

As the Commission knows, LightSquared intends to operate its planned 4G LTE wireless on a wholesale basis. We firmly believe that this approach will enhance competition significantly by facilitating the ability of new providers, such as America 4G, to enter local, regional, and nationwide markets and serve consumers. We believe this will create a significant and new competitive environment, that otherwise may not develop, versus particularly the currently dominating wireless operators. America 4G is a new Mobile Virtual Network Operator (MVNO) which intends to leverage its U.S. and European telecommunications partners to provide innovative mobile services and applications nationwide to government and corporate customers, affinity groups and certain retail users. One of America 4G's European partners,

Syrei Systems, is developing a suite of 4G-LTE applications that in the U.S. will be provided exclusively by America 4G for America 4G's customers. These services will include voice (VoLTE), video, messaging, multimedia and location-based services that will be available on smartphones, tablets, and mobile modems for PCs. Tapping Syrei System's extensive experience in designing and building networks and superior application servers, America 4G will offer these unique, feature-rich services exclusively over LightSquared's nationwide 4G-LTE network. We believe some of these services may not be provided by the existing network operators. The service offerings we have planned, we believe, would significantly reduce the service costs for customers.

More specifically, we believe that LightSquared's wholesale-only model will allow America 4G 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 our operating costs, or preclude us from operating altogether. We believe that the existing major wireless operators dominated by two, AT&T and Verizon, of the four largest carriers have no incentive to permit a small competitive company like ours, with new innovative services, to utilize their network resources at any reasonable cost level. We believe that with LightSquared's wholesale business model and network, we will be able to provide new and innovative services to the American wireless market. It is our opinion that the existing network operators in the US will not permit us to interconnect to their networks with our proprietary operating systems for technical and/or competitive reasons, which will preclude us from offering our services to our potential user and customer base.

We intend to offer users within the Federal Government security features provided by our system over the LightSquared network that might surpass the security features that are currently offered or planned by existing operators. By affirming LightSquared's authorization to operate as contemplated, 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.

We believe that 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*. Many consumers in rural America do not have a wireless broadband option; we believe that LightSquared's network will lead to better wireless coverage and faster broadband service for consumers in both urban and rural markets.

Our company is founded by and operated by long-time entrepreneurs and company builders. As such, we are concerned that if the financial and technological investments LightSquared has made to its network are halted, and potentially put in jeopardy, it could take many years for another entrepreneurial company to become bold enough and to be able to raise enough financing to enter the market and challenge the existing telecom duopoly consisting of AT&T and Verizon.

Accordingly, on behalf of America 4G, Inc., I urge the Commission not to vacate the *Conditional Waiver Order* and not to modify LightSquared's license so severely that it substantially suspends its authority to build a terrestrial-based broadband network on its frequencies.

