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VIA ELECTRONIC FILING

May 14, 2012

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

Re: Notice of *Ex Parte* Presentation; FCC File No. SAT-MOD-20101118-00239; IB Docket No. 11-109

Dear Ms. Dortch:

On May 10, 2012, Jeffrey Carlisle, Executive Vice President – Regulatory Affairs and Public Policy of LightSquared LLC, and James H. Barker and the undersigned of Latham & Watkins LLP, outside counsel to LightSquared (collectively, the “LightSquared Representatives”), met with Austin Schlick, General Counsel of the Federal Communications Commission (“FCC”), along with Sean Lev, Deputy General Counsel; David Horowitz, Assistant General Counsel of the Administrative Law Division; and Gardner Foster, Assistant Chief of the FCC’s International Bureau.

During the meeting, the LightSquared Representatives discussed the status of the above-referenced proceedings, and stressed the Company’s continuing desire and intention to deploy a nationwide 4G wireless broadband network. LightSquared also reiterated its views that (i) the Commission has a number of legal and policy responses that it can take to address the inability of a limited number of GPS receivers to operate properly in spectrum that has not been allocated for GPS use, including working with LightSquared and NTIA to develop spectrum solutions to enable LightSquared to deploy its network; (ii) the actions proposed in the Commission’s February 15, 2012 Public Notice are disproportionate and inappropriate, especially in light of the current administrative record; (iii) LightSquared stands ready to continue to work with federal government stakeholders and the GPS community to find a solution that will placate all affected constituencies; and (iv) as contemplated by the January 2010 Conditional Waiver Order, the Commission should provide LightSquared with the time and engagement necessary for such an outcome to occur, which would serve the public interest, while also encouraging the GPS community to adopt a more constructive posture in promoting and achieving mutually acceptable results.

The LightSquared Representatives explained that the Commission cannot and should not utilize Section 316 to proceed as proposed in the February 15, 2012 Public Notice, and

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summarized LightSquared's arguments to that effect. *See, e.g.*, Reply Comments of LightSquared Inc. (Mar. 30, 2012), at 17-28. The LightSquared Representatives also reiterated LightSquared's position that 47 C.F.R § 25.255 is a procedural rule that offers no substantive right to GPS receivers of protection from "overload" in the MSS bands. *See, e.g.*, Comments of LightSquared (Mar. 16, 2012), at 63-69.

Please contact me with any questions.

Respectfully submitted,

/s/ John P. Janka
John P. Janka