

June 8 2012

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission (FCC)
445 12th Street SW
Washington, D.C. 20554

Re: NovAtel Ex Parte Communication, dated April 24, 2012 in IB Docket 11-109; SAT-MOD-20101118-00239;
Subj: Clarification of comments in the referenced ex parte on the U.S. GPS policy on "Preservation of Continuity for Semi-Codeless GPS Applications", Federal Register Notice (FRN), September 23, 2008

Dear Mrs. Dortch,

I wish to bring to your attention clarification for the record of several points raised in my original ex parte letter to the FCC Office of Engineering and Technology (OET), dated April 24, 2012.

First, the transition of the installed GPS high precision user base from receivers using the semi-codeless tracking technique to coded tracking based on modernized GPS signals was originally described as occurring when the "L2 P/Y code is shut down". I need to clarify that there is no indication of a shutdown of the L2 P/Y code in the U.S. GPS policy in the FRN. To the contrary, the U.S. Government makes a significant effort to ensure a "preservation of continuity of semi-codeless GPS applications" (attached and also see <http://www.gps.gov/technical/codeless/>).

Second, I described the useful threshold number of satellites available on-orbit necessary to enable modernized coded tracking by the GPS high precision installed base as "more than 18". In the 2008 FRN, the useful threshold is a minimum of 24 full operational capability satellites broadcasting both the modernized GPS L2C and L5 signals. This point is stated explicitly in the 2008 FRN Summary: "To enable an orderly and systematic transition, the U.S. Government has established December 31, 2020 as the date by which users of semi-codeless/codeless receiving equipment are expected to transition to using GPS civil-coded signals. Based on the current launch schedule and projected budget, the December 31, 2020 transition date represents the planned availability of the second and third coded civil GPS signals being broadcast from a minimum of 24 GPS satellites. Department of Defense will reassess the transition date should significant GPS program delays arise." "Full operational capability of the L2C and L5 GPS signals in combination with the existing L1 C/A signal will enable the full spectrum of dual frequency applications without using the P(Y) signals."

NovAtel, together with the GPS community, looks forward to supporting the National Telecommunications and Information Administration, the National Space-based Positioning, Navigation, and Timing Executive Committee, and the FCC in assuring that future proposals for non-space, commercial spectrum uses protect GPS.

To the best of my knowledge, the United States is faithfully executing the GPS policy on the semi-codeless transition and I appreciate the opportunity to revise and correct my original comments.

Patrick C. Fenton, P.Eng.
Vice President and Chief Technology Officer
NovAtel, Inc.
1120 68 Avenue N.E.
Calgary, AB Canada, T2E 8S5

cc. Mr. Karl Nebbia
NTIA