



December 04, 2012

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: DA 12-1863, IB Docket No. 12-340; RM-11683

Dear Secretary Dortch:

On behalf of ESCO Technologies, LLC, I am writing in support of LightSquared's recent License Modification Application and its proposal to build a nationwide 4G LTE wireless network and operate it on a wholesale-only basis. ESCO Technologies, LLC is a Telecommunication Company serving the retirement industry with nearly 100 properties nationwide. .

As the Commission knows well, our country's mobile wireless infrastructure must be sufficiently robust to not only handle current mobile wireless consumption but also encourage innovations, new goods and services. So long as there is access to sufficient bandwidth, the economic growth opportunities of mobile broadband are simply limitless. The challenge to American competitiveness in the global market is real, and much hinges on the Commission's ability to make spectrum available in a manner that unleashes the waves of innovation associated with additional mobile broadband capacity.

LightSquared's proposal to permanently relinquish terrestrial use of the "upper 10 MHz" and to share 5 MHz of federal spectrum in the wholesale provision of LTE service nationwide will enhance competition significantly by facilitating the ability of new providers to enter local, regional, and nationwide markets and serve customers. For example, LightSquared's planned network would help us to better reach the rural locations where many of the Assisted living facilities reside, that need our voice and data services.

More specifically, LightSquared's wholesale-only model will allow wholesale 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 operating costs, or preclude us from providing expanded coverage or innovative services altogether.

Hundreds of millions of American consumers would benefit from the competition, coverage and innovations that would be made possible by LightSquared's network. Accordingly, we urge the Commission to grant LightSquared's Application and proposal to deploy a wholesale-only LTE network as quickly as possible.

Respectfully submitted,


Jerry Grove
President & CEO