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December 12, 2012

Ms. Marlene Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554-0004

Re: Comments in Response to FCC Public Notice Dated November 16, 2012 in IB Docket No. 12-340

Dear Ms. Dortch:

The Aircraft Owners and Pilots Association (AOPA) represents the general aviation industry – which is all aviation operations, pilots, and manufacturers, other than scheduled commercial airlines and military aircraft.

Global Positioning System (GPS) devices are critical safety components of the nation-wide air transportation infrastructure. Business and personal transportation, as well as medical, firefighting, law enforcement, humanitarian, and agricultural operations, depend upon the proper functioning of GPS receivers and GPS-dependent aircraft safety systems. As a result, the national GPS system must be protected from harmful interference.

AOPA firmly supports the Federal Communication Commission (FCC's) February 14, 2012 Public Notice recognizing that there is no practical way to mitigate potential GPS interference from LightSquared's many proposals. AOPA therefore supports implementing the actions proposed in the Public Notice: vacating LightSquared's Conditional Waiver Order, modifying LightSquared's satellite license, and suspending indefinitely LightSquared's ATC authorization. Aviation safety depends upon expeditiously resolving these outstanding issues, instead of allowing piecemeal, parallel proceedings involving other requests by LightSquared.

Moreover, in response to the latest LightSquared proposal, the FCC should not permit use of any spectrum that may cause harmful interference with GPS devices. First, the FCC should not permit any use of LightSquared spectrum that in the past has been shown to cause potential interference. Second, the FCC should only permit use of a new spectrum if it is known *in advance* that use of the spectrum will have no effect on GPS devices. For that reason, AOPA requests that the FCC investigate the possibility of interference with GPS devices *before* it issues any conditional or initial approvals regarding a new spectrum.

On the separate issue of the revision of standards for GPS receivers, the FCC should ensure that current GPS receivers are able to continue functioning, that the cost of new GPS receivers will not increase, and that the new standards do not interfere in any way with the continued good functioning of the national GPS system.

In addition, AOPA requests that the FCC ensure that the use of any proposed spectrum would not harm aviation safety in any other way. In particular, AOPA is concerned that use of new

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spectrum by LightSquared could crowd out or interfere with important weather services. Weather services are essential to aviation safety. Pilots cannot safely travel without timely, accurate, and detailed information about the weather. For example, it is critical for pilots and airports to be able to predict and monitor the movement of major storms, conditions in the air, and conditions at local airports. AOPA therefore urges the FCC to ensure that opening up spectrum used by weather services will not interfere with or crowd out those weather services.

On behalf of the 400,000 members of AOPA, we strongly urge that you continue to protect the integrity of the GPS system and weather services. By acting now to preserve GPS and weather services from both present and future threats, you can help ensure the continued safety and efficacy of general aviation.

Sincerely,

A handwritten signature in black ink, appearing to read "Heidi J. Williams". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Heidi J. Williams
Vice President
Air Traffic Services and Modernization