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December 14, 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 America 4G, Inc., 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.

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 are planned to include voice, 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 plans to 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.

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. For example, we firmly believe that LightSquared's planned network would 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 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 may 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 base. We intend to offer users within among others the Federal Government security features over the LightSquared network that might surpass the security features that are currently offered by existing operators.

More specifically, LightSquared's wholesale-only model will allow wholesale partners like us 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,

AMERICA 4G, INC.



By: _____

Arne Dunhem
Chairman & CEO