

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
LightSquared Request to Modify its ATC Authorization	)	IB Docket No. 12-340
	)	
LightSquared Subsidiary, LLC	)	RM-11683
	)	
Petition for Rulemaking on Development of Operating Parameters for Terrestrial Use of the 1526-1536 MHz Portion of the L Band	)	

**COMMENTS OF THE COMPETITIVE CARRIERS ASSOCIATION**

The Competitive Carriers Association (“CCA”)<sup>1</sup> submits these comments on LightSquared Subsidiary LLC’s (“LightSquared”) modification application to permanently relinquish its right to deploy terrestrial downlink operations at 1545-1555 MHz and permanently relocate those terrestrial operations to 1670-1680 MHz. CCA also supports LightSquared’s Petition for Rulemaking seeking to develop operating parameters for terrestrial use of the 1526-1536 MHz portion of the L-Band.<sup>2</sup>

I. Introduction

CCA has long supported the Commission’s efforts to enhance competition in the wireless industry and facilitate the introduction of new wireless service providers. CCA also has

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<sup>1</sup> CCA is the principal association representing more than 100 competitive wireless telecommunications providers across the United States, including many regional and rural wireless carriers. CCA recently changed its name from RCA—The Competitive Carriers Association to more accurately reflect the composition of its membership.

<sup>2</sup> CCA acknowledges that LightSquared’s various requests are segmented across several separate proceedings currently before the Commission, as should be the case. CCA submits these combined comments for ease of reference and so as to avoid redundancy and multiple filings. Nevertheless, CCA believes these requests should continue to proceed expeditiously on separate tracks.

supported the *National Broadband Plan*'s goal of identifying and dedicating an additional 500 MHz of spectrum for mobile broadband use within ten years.<sup>3</sup> Unfortunately, efforts to meet that goal have fallen short. Meanwhile, Verizon recently closed its deal with the cable companies to acquire over 20 megahertz of AWS spectrum and AT&T has proposed over 40 separate acquisitions of 4G LTE spectrum, further aggregating scarce spectrum resources and limiting access for competitive carriers.

Given CCA's members' current need for usable spectrum, the wholesale capacity, as LightSquared has indicated will be offered on its network, represents a potential alternative pathway to 4G, particularly for competitive carriers seeking a nationwide footprint and enhanced speeds, but facing additional, well-documented challenges in deploying their own 4G networks.<sup>4</sup> Such wholesale capacity, which LightSquared has indicated it will make available at rates lower than current prevailing rates,<sup>5</sup> also promises to provide another way for smaller carriers to offer high-speed service capable of competing with the nation's two largest wireless providers. CCA and its members thus have supported LightSquared's entry into the marketplace as a new wholesale provider (alongside others), and many CCA members had planned to partner with LightSquared to utilize its mobile wireless solutions.

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<sup>3</sup> Connecting America: The National Broadband Plan, at 84 ("*National Broadband Plan*").

<sup>4</sup> See Comments of Competitive Carriers Association, *Inquiry Concerning the Deployment of Advanced Telecommunications Capacity to All Americans in a Reasonable and Timely Fashion, and Possible Steps to Accelerate Such Deployment Pursuant to Section 706 of the Telecommunications Act of 1996, as amended by the Broadband Data Improvement Act*, GN Docket No. 12-228, at 11-15 (filed Sept. 20, 2012).

<sup>5</sup> Maisie Ramsay, *LightSquared: We'd Halve LTE Prices*, WIRELESSWEEK.COM, Mar. 29, 2012; Scott Moritz and Todd Shields, *LightSquared Vows Lower Data Bills*, BLOOMBERG, Dec. 9, 2011 (noting that the starting price for LightSquared's high-speed Internet service will be \$7 per gigabyte and that "the market rate is about \$10 a gigabyte").

## II. Modification of Applications

In its modification applications, LightSquared proposes to: (1) permanently relinquish its authority to operate terrestrial facilities at 1545-1555 MHz; (2) temporarily forego terrestrial operations at 1526-1536 MHz during the pendency of a proposed rulemaking to develop new terms for such operations; and (3) to conduct terrestrial operations at 1675-1680 MHz (which LightSquared would combine with its existing rights to use 1670-1675 MHz) in conjunction with its L-Band uplink spectrum. LightSquared seeks this authority to resolve questions about the compatibility of certain Global Positioning System (“GPS”) receivers with LightSquared’s terrestrial operations at 1525-1559 MHz. CCA recommends the Commission grant LightSquared’s license modification applications, which would help to resolve complex spectrum management questions and also would enhance competition for the benefit of American consumers.

LightSquared’s license modification applications present a reasonable and viable path forward that would facilitate LightSquared’s ability to deploy this network—and thus realize the benefits described above—while advancing the Commission’s spectrum management policies more generally. Additionally, CCA supports LightSquared’s request to conduct terrestrial operations at 1675-1680 MHz. Because of its current proximity to that band, LightSquared is uniquely qualified to operate in the 1675-1680 MHz space in coordination with federal users based on its present use of the 1670-1675 MHz band. This presents an opportunity for continued development of mobile broadband spectrum opportunities in instances where reallocating cleared spectrum for mobile broadband may not be immediately possible.

### III. Petition for Rulemaking

CCA also supports LightSquared's Petition for Rulemaking to seek the development of revised operating parameters that would allow terrestrial use of the 1526-1536 MHz segment of the L-Band. CCA continues to believe that the capacity that LightSquared promises to make available on its network—including in the future by using spectrum at 1526-1536 MHz once new terms for operation are established—would allow millions of Americans to realize the benefits of enhanced competition, leading to lower rates, higher service quality and increased choice. In particular, the availability of LTE-capable capacity on this network would provide an alternative opportunity for competitive wireless carriers to offer 4G service in unserved and underserved rural areas, and to launch such service on a national scale.

### IV. Conclusion

For the reasons outlined above, CCA supports the grant of its modification applications, as well as LightSquared's request for a notice of proposed rulemaking to develop new operating parameters for terrestrial use of the 1526-1536 MHz band.

Respectfully submitted,

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