

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

In the Matter of)
)
Comprehensive Review of Licensing and) IB Docket No. 12-267
Operating Rules for Satellite Services)

COMMENTS OF LIGHTSQUARED INC.

LightSquared Inc., together with its affiliates (collectively, “LightSquared”), hereby responds to the *Notice of Proposed Rulemaking* issued by the Commission on September 28, 2012 in the above-captioned proceeding (the “*NPRM*”). The *NPRM* initiates a comprehensive review of Part 25 of the Commission’s rules, and proposes amendments intended to “modernize the rules to better reflect evolving technology, eliminate unnecessary technical and information filing requirements for applicants requesting space and earth station licenses, and reorganize and simplify existing requirements.”¹

LightSquared applauds the Commission’s efforts to update its rules to ensure that they facilitate the ability of satellite operators to extend quality services to the public. As the Commission suggests, streamlining the regulatory requirements set forth in Part 25 would “remove administrative burdens on both stakeholders and the Commission.”² Indeed, eliminating duplicative, obsolete, and otherwise unnecessary rules would facilitate the efforts of satellite operators to focus on the development and implementation of innovation communications solutions, while conserving limited Commission resources and eliminating unnecessary “red tape” within the agency. At the same time, revising Part 25 to ensure that all

¹ *Comprehensive Review of Licensing and Operating Rules for Satellite Services*, FCC 12-117, at ¶ 3 (Sept. 28, 2012).

² *Id.* ¶ 5.

rules account for technological developments—and in particular to reflect new classes of facilities and services—would provide greater certainty and reduce the risks inherent in innovative business models.

In addition, rationalizing and harmonizing Part 25 would provide greater transparency and allow the public to better understand both the substance of the Commission’s rules and the manner in which they are applied to different parties. As President Obama has recognized, “[t]ransparency promotes accountability and provides information for citizens about what their Government is doing.”³ Reconfiguring Part 25, as the Commission has proposed, would help to ensure that: (i) similar services generally are treated in similar fashion, by reducing the potential for inadvertent divergent outcomes; and (ii) distinctions, where they are made, are obvious on the face of the rules and not apparent only through an analysis of scattered rule sections.

In sum, LightSquared shares the view of the Satellite Industry Association (“SIA”) that “[a] sensible and up-to-date regulatory framework is vital to the robust innovation and investment that are hallmarks of the satellite sector.”⁴ LightSquared has been engaged in the Part 25 reform process for some time through its membership in SIA, and appreciates the Commission’s willingness to engage with SIA and other stakeholders in developing the proposals set forth in the *NPRM*. LightSquared plans to continue to work with and through SIA to provide additional input and feedback to the Commission and other interested parties.

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³ See President Barack Obama, *Memorandum on Transparency and Open Government* (Jan. 21, 2009).

⁴ See Satellite Industry Association, *Press Release: The Satellite Industry Association Welcomes FCC Proposal to Streamline Satellite Regulations* (Sept. 28, 2012).

Through the *NPRM*, the Commission has initiated a valuable process that should increase regulatory efficiency, certainty, and transparency, while improving the ability of operators to provide innovative communication solutions to the public. LightSquared stands ready to work with the Commission and other stakeholders as this process unfolds.

Respectfully submitted,

/s/ Jeffrey J. Carlisle

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