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Established in 1978 by

DAVID PACKARD

May 8, 2013

The Honorable Julius Genachowski
Chairman
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

RE: WT Docket No. 11-49

Dear Chairman Genachowski,

On behalf of the Silicon Valley Leadership Group, I would like to comment on the request by Progeny LMS, LLC for authority to begin commercial operations in the 902-928 MHz band to provide location services under its M-LMS licenses. We urge the FCC to carefully consider the concerns registered by a number of Silicon Valley companies who contend that Progeny's proposed operations will cause unacceptable levels of interference to their products. We also urge the FCC to require additional testing to avoid negative, unintended consequences on the innovation economy.

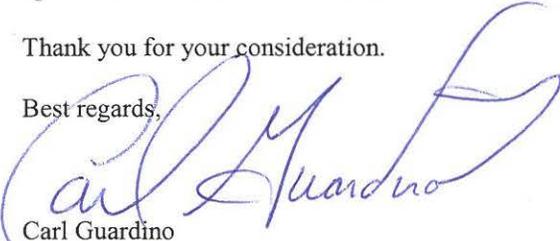
The Silicon Valley Leadership Group is a public policy business trade organization founded in 1978 by David Packard of Hewlett-Packard and represents more than 375 of Silicon Valley's most respected employers. Leadership Group members collectively provide nearly one of every three private sector jobs in Silicon Valley and contribute more than \$3 trillion to the worldwide economy.

The unlicensed spectrum is a source of great innovation in advanced communication. Many Silicon Valley companies design, build, or operate equipment for unlicensed use on the 902-928 MHz band. Any risk that Progeny poses to these or other technologies using the 902-928 MHz band should be clearly and objectively understood before Progeny is allowed to begin commercial operation of its equipment. From our standpoint, it is important that the 902-928 MHz band remain available for unlicensed devices, while ensuring that Progeny's location service does not cause unacceptable levels of interference to unlicensed services.

Before current technology is impacted, with the possibility of negative repercussions to our member companies, the Silicon Valley Leadership Group would like to see cooperative testing on the interference levels with a variety of unlicensed users before Progeny is allowed to begin commercial operations on the 902-928 MHz band.

Thank you for your consideration.

Best regards,



Carl Guardino

President and CEO
Silicon Valley Leadership Group

cc:

The Honorable Anna Eshoo
The Honorable Sam Farr
The Honorable Mike Honda
The Honorable Zoe Lofgren
The Honorable Jackie Speier
The Honorable Eric Swalwell