

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
LightSquared Request to Modify Its ATC Authorization)	IB Docket No. 12-340
)	
)	IBFS File Nos. SAT-MOD-20120928-00160; SAT-MOD-20120928-00161; SAT-MOD-20101118-00239; SES-MOD-20121001-00872
)	
LightSquared Technical Working Group Report)	IB Docket No. 11-109
)	
LightSquared Petition for Rulemaking to Allocate the 1675-1680 MHz Band for Terrestrial Mobile Use)	RM-11681
)	
Request by OP LLC for Extension or Waiver of the Construction Deadline Concerning its 1670-1675 MHz Band License)	WT Docket No. 12-327
)	

REPLY COMMENTS OF INMARSAT

Inmarsat, Inc. (“Inmarsat”) submits these reply comments in connection with the August 7, 2013 Public Notice in the above-referenced proceedings.¹

These reply comments address the proposal of Greenwood Telecommunications Consultants LLC (“Greenwood”) that the Commission impose a limit on out-of-band emissions (“OOBE”) from “all mobile devices with a carrier frequency near the GNSS L1 [GPS signal],”² which limit would require devices in neighboring bands to reduce their OOBE by a factor of more than 3000.

¹ See Comments Sought on LightSquared Subsidiary LLC *Ex Parte* Filing, DA 13-1717 (Aug. 7, 2013).

² Comments of Greenwood Telecommunications Consultants LLC, IB Docket No. 12-340, at 2 (Sep. 6, 2013) (“Greenwood Comments”).

As the owner and operator of a fleet of satellites that provide essential services to a wide variety of end users in the neighboring L Band, and as the licensee of numerous types of mobile earth terminals (“METs”) that communicate with those satellites, Inmarsat has a vested interest in any proposed changes to the technical limits that apply to those METs. As detailed below, the Greenwood proposal is both inappropriate and unnecessary.

Inmarsat’s judgment on this matter is informed by its decades of experience with the successful operation of hundreds of thousands of METs in L-Band spectrum adjacent to the GPS band without any adverse impact on GPS receivers. Many of these METs operate in close proximity to those GPS receivers (often within the same device) and are subject to far less restrictive OOB limits than those that Greenwood proposes.

More specifically, the Commission’s rules currently provide that OOB from Inmarsat METs into the GPS band may not exceed -70 dBW/MHz. *See* 47 C.F.R. § 25.216. This limit has been more than sufficient to ensure the compatibility of GPS receivers and Inmarsat METs. Inmarsat is not aware of any evidence that GPS receivers are in any way at risk from Inmarsat METs or other L-Band mobile devices, or that the revised OOB limits for L-Band METs that were enacted in November 2003 are not adequate.³

Greenwood offers no evidence to the contrary and thus no good reason to impose a much stricter limit of -105 dBW/MHz. To the contrary, Greenwood acknowledges that it has offered its proposal primarily “for sake of consistency” with a similar proposal that it made, and the Commission rejected, in the AWS-4 proceeding.⁴

³ *Global Mobile Personal Communications by Satellite; Memorandum of Understanding and Arrangements*, 18 FCC Rcd 24423 (2003).

⁴ *See* Greenwood Comments at 2; *see also Service Rules for Advanced Wireless Services in the 2000-2020 MHz and 2180-2200 MHz Bands*, 27 FCC Rcd 16102, at ¶¶ 121-122 (2012).

Inmarsat and its partners have invested hundreds of millions of dollars developing and deploying METs that comply with the existing OOB limits. These METs are widely deployed both in the United States and internationally, and are relied upon by a wide range of critical infrastructure, U.S. Government and commercial users. Given the complete absence of any evidence that those existing OOB limits are inadequate, Inmarsat urges the Commission not to give credence to Greenwood's OOB proposal.

Respectfully submitted,

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