

October 18, 2013

Via Electronic Filing

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Room TW-A325
Washington, D.C. 20554

Re: Notice of Ex Parte Presentation: IB Docket No. 11-109; DA 12-1863, IB Docket No. 12-340; IBFS File Nos. SATMOD-20101118-00239; SAT-MOD-20120928-00160; SAT-MOD-20120928-00161; SES-MOD-20121001-00872; RM-11681; WT Docket No. 12-327

Dear Ms. Dortch:

On September 30, 2013, on behalf of the GPS Innovation Alliance, which includes Trimble Navigation Limited (“Trimble”), Garmin International, Inc. (“Garmin”), and Deere & Company (“Deere”) as founding members (Trimble, Garmin and Deere are collectively referred to herein as the “GPS Parties”) the undersigned, as counsel for Deere, spoke via telephone with Julius Knapp about matters in the above-referenced proceedings. In particular, we discussed the continuing interest of the GPS Parties in the various pending applications and revised proposals of LightSquared Subsidiary LLC, including the July 15, 2013 *ex parte* presentation regarding the interference issues raised by LightSquared’s potential operation of terrestrial wireless handsets in the 1626.5-1660.5 MHz Mobile Satellite Service (“MSS”) band.¹ We discussed the status of the proceedings and the view of the GPS Parties, as set forth in their comments and reply comments filed in response to LightSquared’s *ex parte* submission, that LightSquared’s technical analysis of the potential interference to Global Positioning System (“GPS”) receivers is flawed and fails to address the potential interference that LightSquared’s handsets would cause to GPS devices.² Those filings state that the Commission should not rule on LightSquared’s modification applications, but, instead, the risk of interference to GPS devices and proposed new spectrum uses should be considered in the context of a transparent public notice and comment rulemaking proceeding, as was done with 2 GHz Mobile Satellite Spectrum now known as AWS-4 spectrum.

I reiterated the commitment of the GPS Parties to work with the Commission staff and the parties in this proceeding to provide a better understanding of the interference threat that LightSquared’s proposed operation raises for the many millions of government, business, and consumer users that rely on GPS for many applications, including applications critical to health and safety and major industries.

^{1/} See “LightSquared Assessment of Uplinks in the 1626.5-1660.5 MHz Band,” *attached to* Letter from John P. Janka, Latham & Watkins LLP, Counsel to LightSquared, to Marlene H. Dortch, Secretary, FCC, IB Docket No. 11-109, *et al.* (filed July 15, 2013) (“*Ex Parte*”).

² See Comments of the GPS Innovation Alliance, IB Docket No. 12-340, *et al.* (filed Sept. 6, 2013); *see also* Reply Comments of the GPS Innovation Alliance, IB Docket No. 12-340, *et al.* (filed Sept. 23, 2013).

This *ex parte* notice is being filed in accordance with the Commission's instructions with respect to filings due during a government -wide shutdown.³ Please do not hesitate to contact the undersigned with any questions.

Respectfully Submitted,

/electronically signed/

Catherine Wang
Counsel for Deere & Company

cc: Julius Knapp
Russell H. Fox (counsel for Trimble Navigation Limited)
M. Anne Swanson (counsel for Garmin International, Inc.)

³ See *Procedures for Filings in the Event of a Lapse in Funding*, Public Notice (rel. Oct. 1, 2013); see also *Revised Filing Deadlines Following Resumption Of Normal FCC Operations*, Public Notice, DA 13-2025 (rel. Oct. 17, 2013).