

March 7, 2014

SUBMITTED ELECTRONICALLY

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Notice of Ex Parte Presentation

IB Docket No. 11-109; IB Docket No. 12-340; IBFS File Nos. SAT-MOD-20101118-00239, SAT-MOD-20120928-00160, SAT-MOD-20120928-00161, SES-MOD-20121001-00872

Dear Ms. Dortch:

On March 5, 2014, and March 6, 2014, James A. Kirkland, Vice President and General Counsel of Trimble Navigation Limited (“Trimble”), and the undersigned counsel conducted separate meetings with the members of the Commission shown on the attached list.

In each meeting, we reiterated positions taken by Trimble, the U.S. GPS Industry Council and its successor, the GPS Innovation Alliance (of which Trimble is a member) in the above-referenced proceedings. In particular, we pointed out that testing has demonstrated that spectrum proposed by LightSquared for downlink operations will cause harmful interference to GPS reception, that use cases have been identified under which deployment of LightSquared’s proposed uplink bands could also disrupt GPS operations, and that further testing is required to assess interference potential. We reiterated our commitment to work with MSS licensees, the FCC and all interested stakeholders to further evaluate potential uses of the L-Band spectrum in ways that will not jeopardize the hundreds of millions GPS devices in operation today.

Pursuant to Section 1.1206(b)(2) of the Commission’s rules, an electronic copy of this letter and the attachment are being filed for inclusion in the above-referenced dockets. Copies of this letter and the attachment are being provided to all Commission employees who attended the meetings. Please direct any questions regarding this filing to the undersigned.

Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C.

BOSTON | LONDON | LOS ANGELES | NEW YORK | SAN DIEGO | SAN FRANCISCO | STAMFORD | WASHINGTON

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Very truly yours,

/s/ Russell H. Fox

Russell H. Fox
Counsel for Trimble Navigation Limited

Attachment

cc: FCC employees shown on the attached list, with attachment (via e-mail)

MEETING ATTENDEES
TRIMBLE NAVIGATION LIMITED

MARCH 5, 2014

Meeting 1

- Brendan Carr, Legal Advisor to Commissioner Pai

Meeting 2

- Charles Mathias, Wireless Telecommunications Bureau
- Jonathan Chambers, Office of Strategic Planning and Policy Analysis

MARCH 6, 2014

Meeting 1

- Mindel de la Torre, International Bureau
- Paul Murray, Wireless Telecommunications Bureau
- Julius Knapp, Office of Engineering and Technology
- Ronald Repasi, Office of Engineering and Technology
- Michael Ha, Office of Engineering and Technology
- Mark Settle, Office of Engineering and Technology
- Robert Pavlak, Office of Engineering and Technology
- Robert Nelson, Office of Engineering and Technology

Meeting 2

- Erin McGrath, Legal Advisor to Commissioner O’Rielly

Meeting 3

- Philip Verveer, Senior Counselor to Chairman Wheeler
- Renee Gregory, Legal Advisor to Chairman Wheeler

Meeting 4

- David Goldman, Senior Legal Advisor to Commissioner Rosenworcel