

Message from Curt Sumner, Executive Director, ACSM

LightSquared Claims that GPS Receivers Not Entitled to Interference Protection

Please read the excerpts below from the series of articles that are linked (immediately below) in today's release from the Coalition.

It is more important than ever for our voices to be heard regarding the LightSquared issue. The FCC has asked for comments related to LightSquared's claim that "Commercial GPS receivers are not licensed, do not operate under any service rules, and thus are not entitled to any interference protection whatsoever", requesting that the FCC "not grant interference protection to global positioning systems."

Comments are due by February 27. Attached is a message from our Government Affairs Consultant Laurence Socci containing the FCC announcement.

As always, thank you for your participation in this vitally important matter.

Curt

Coalition to Save Our GPS Clips January 31, 2012

[Reuters](#) reports that Sprint has agreed to give LightSquared another month and a half to address GPS interference concerns. Sprint extended LightSquared's deadline already by one month to the end of January, but said on Monday it would do so again—this time extending the deadline until mid-March.

[TR Daily](#) corrected a Jan. 27 story that appeared in yesterday's clips. The article said the FCC sent the NTIA a report on LightSquared-Global Positioning System interference testing. The report was sent by the FAA.

[PC World](#), [TWICE](#), [TV Technology](#), [GPS World](#), [Into Mobile](#), [Rethink Wireless](#), [POB Online](#) and [Light Reading](#) continue to report that the FCC is seeking public comment on a petition for declaratory ruling by LightSquared that says GPS receivers aren't entitled to protection from interference.

[Forbes.com](#) and [Fierce Wireless](#) continue to report that AT&T said in an FCC filing that Dish Network should receive buildout requirements similar to those required of LightSquared.

A cite list and links to the full text of these and other articles follow.

1. Light Reading, Public Sucked Into LightSquared Squabble, JANUARY 30, 2012 | Dan Jones
2. Agriculture.com, Feds send LightSquared back to the drawing board, Jeff Caldwell, 01/30/2012 @ 9:59am
3. Fierce Wireless, AT&T circling Dish? Carrier argues against restrictions on Dish's spectrum, January 30, 2012 — 10:26am ET | By Phil Goldstein
4. TV Technology, DEBORAH D. MCADAMS, 01.30.2012 12:00AM, FCC Takes LightSquared Petition to the People

5. GPS World, GNSS System, FCC Asks If You and GPS Should Be Protected from Interference, January 30, 2012
6. PC World, Jan 30, 2012 2:40 pm, FCC Seeks Public Comment on LightSquared Petition, By Stephen Lawson, IDG News
7. Forbes.com, TECH | 1/30/2012 @ 1:39PM, AT&T: Still Coveting Dish Network's Wireless Spectrum? By Eric Savitz
8. TWICE, FCC To Hear LightSquared Petition, By Joseph Palenchar -- TWICE, 1/30/2012
9. CNET, Is AT&T jockeying for Dish's wireless spectrum? by Marguerite Reardon January 30, 2012 2:00 PM PST
10. IntoMobile, The FCC wants to hear your thoughts about LightSquared's proposed 4G LTE network, BY: STEFAN CONSTANTINESCU, INTOMOBILE, TUESDAY, JANUARY 31ST, 2012 AT 12:28 AM
11. Rethink Wireless, LightSquared gets reprieve, AT&T argues over Dish, FCC agrees to public consultation over the GPS interference issue, while AT&T calls for Dish's spectrum to be unencumbered, By CAROLINE GABRIEL, Published: 31 January, 2012
12. POB Online, LightSquared Seeks Ruling to Remove GPS Protections , January 30, 2012
13. COMMUNICATIONS DAILY, January 31, 2012 Tuesday, COMM DAILY(R) NOTEBOOK, SECTION: COMM DAILY(R) NOTEBOOK, LENGTH: 157 words
14. TR Daily, CORRECTION: LightSquared REPORT TO NTIA, 42 words, 30 January 2012
15. CT Reports, Spectrum Sudoku: Feds Have Verizon's, AT&T's Numbers, 1138 words, 30 January 2012, By Jeffrey Silva
16. Reuters, Sprint extends LightSquared deadline to mid-March, 236 words, 30 January 2012, 11:03

Excerpts/Links to Full Text of Articles

Light Reading, Public Sucked Into LightSquared Squabble, JANUARY 30, 2012 | Dan Jones

LightSquared got some breathing space Friday as the Federal Communications Commission (FCC) granted a public comment period on the carrier's petition about its rights to use the spectrum licensed to it.

On Dec. 20, LightSquared petitioned the agency about the waiver it issued on Jan. 23 2011 to allow the operator to build an LTE network in L-Band spectrum. The L-Band spectrum is right next to bandwidth used by GPS receivers and some of them would "see" transmissions from the planned network, causing interference.

LightSquared said that the GPS industry had known for eight years that a terrestrial network in the L-Band spectrum was coming from LightSquared or its predecessors. Yet the industry didn't change the design of their receivers.

"Commercial GPS receivers are not licensed, do not operate under any service rules, and thus are not entitled to any interference protection whatsoever," LightSquared claimed in its December petition.

The FCC has now opened up a public comment period on this. It will run until Feb. 27 with follow-ups due by March 13.

To read more click [here](#).

[<Return to top>](#)

Agriculture.com, Feds send LightSquared back to the drawing board, Jeff Caldwell, 01/30/2012 @ 9:59am

There are a lot of people in rural America -- including a lot of farmers -- who could benefit from better wireless connectivity. But, there's a big hitch in one company's plan to boost rural broadband coverage that could interfere with farmers' work, and as of right now, things aren't looking too bright for that proposal.

In a fight that's been going on for more than a year, LightSquared, a provider of wireless connectivity technology, has been the target of scrutiny from the federal government, and that's got the company's plan to bring 4G LTE connectivity to rural America on hold. Federal officials say the new broadband network has the potential to disrupt GPS signals on which a lot of today's large-scale farm machinery relies. The proposed 4G connectivity would operate on a different frequency than GPS, but the frequencies' proximity could create signal issues, federal officials say.

"Over the past year we have closely worked with LightSquared to evaluate its original deployment plan, and subsequent modifications, to address interference concerns," said Ashton Carter, deputy Secretary of Defense, in a letter to the U.S. Department of Commerce's Lawrence Strickling earlier this month. "It is the unanimous conclusion of the test findings by the National Space-Based PNT EXCOM Agencies that both LightSquared's original and modified plans for its proposed mobile network would cause harmful interference to many GPS receivers."

The recommendation comes about a year after federal officials called for more testing and investigation before moving forward with any further development of a nationwide broadband network by LightSquared.

To read more click [here](#).

[<Return to top>](#)

Fierce Wireless, AT&T circling Dish? Carrier argues against restrictions on Dish's spectrum, January 30, 2012 — 10:26am ET | By Phil Goldstein

AT&T (NYSE:T) said the FCC should not place restrictions on how Dish Network uses its spectrum, according to a recent filing with the FCC. The carrier's position could reflect interest by AT&T in Dish's airwaves.

In a Jan. 26 filing with the FCC, AT&T also said that Dish should be held to the same buildout targets that the FCC imposed on LightSquared. The carrier also said the FCC should impose the same interference rules on Dish's mobile operations that it has placed on other 700 MHz licensees.

Dish is seeking the FCC's approval to build an LTE Advanced network with the 40 MHz of S-band spectrum in the 2 GHz range it purchased from TerreStar Networks and DBSD North America. AT&T said the FCC should not impose the kind of restrictions on Dish that it placed on LightSquared's proposed wholesale LTE network. The FCC has said that LightSquared needs FCC approval for the sale or leasing of more than 25 percent of its network capacity to one of the two largest terrestrial carriers by market share--AT&T or Verizon Wireless (NYSE:VZ).

AT&T said the FCC has no authority to place restrictions on how Dish uses its spectrum. "Imposing restrictions on commercial activities with specific parties in this instance would be anticompetitive, discriminatory, and the height of arbitrary and capricious administrative action," AT&T said.

However, public interest groups including Free Press, Public Knowledge, Consumers Union and the New America Foundation are urging the FCC to impose same kind of sale or leasing stipulations on Dish that the agency did with LightSquared. The groups are also urging the agency to approve the Dish transaction without delay in a bid to increase mobile broadband competition.

To read more click [here](#).
<[Return to top](#)>

TV Technology, DEBORAH D. MCADAMS, 01.30.2012 12:00AM, FCC Takes LightSquared Petition to the People

WASHINGTON: The Federal Communications Commission is turning to the public regarding LightSquared's request to operate in its own spectrum and not grant interference protection to global positioning systems. LightSquared filed the petition in December, imploring the commission to "confirm that commercial GPS manufacturers have no right to interference protection from LightSquared's spectrum since they are not licensed users of that spectrum." GPS devices operate in spectrum adjacent to LightSquared's, but they haven't the signal rejection capacity necessary to prevent interference from LightSquared's proposed satellite-terrestrial broadband network.

The commission cannot grant LightSquared's petition prima facie until the GPS interference issue is resolved, but it notes that the petition "raises general questions about the regulatory status of GPS devices."

The FCC on Friday opened a comment period for public feedback on the request. The company has long argued that the GPS interference problem is with the devices themselves, and not signal bleed from its proposed network. However, LightSquared's L-band spectrum is designated primarily for satellite transmissions, with allowance for an "Ancillary Terrestrial Component" to fill in gaps. Its proposal comprises a terrestrial infrastructure of 40,000 base stations, using satellite transmissions to fill in the gaps of a nationwide LTE wireless broadband network. LightSquared had to get a waiver of the ATC from the commission before it could commence operations. The FCC granted the waiver on the condition that LightSquared not interfere with GPS operations.

"To date, the Interference-Resolution Process has not been completed," the FCC noted Friday in opening the public comment cycle.

LightSquared's regulatory odyssey includes a first round of tests that demonstrated significant interference with GPS operations. It then modified its plan to launch at a lower power on the half of its 20 MHz of spectrum farthest from the GPS band. Under the modification, LightSquared said that only a small fraction of high-precision devices would be affected, and these could be equipped with filters to prevent interference. Subsequent tests by a government consortium concluded that interference levels remained unacceptable and inalterable.

To read more click [here](#).
<[Return to top](#)>

GPS World, GNSS System, FCC Asks If You and GPS Should Be Protected from Interference, January 30, 2012

“We invite comment on LightSquared’s petition, and establish a pleading cycle.” Thus spake the Federal Communications Commission (FCC), groping for a way forward in the ongoing LightSquared/GPS conflict. The FCC has opened an Internet docket for public comment on the LightSquared position that GPS users and receivers “do not merit legal protection from interference” created by LightSquared. The FCC asks for comments by February 27.

LightSquared asked the FCC in December to rule that GPS receivers and users “do not merit legal protection from interference” caused by the proposed wireless broadband service. Such interference has been amply demonstrated by comprehensive testing from May to October of last year. Opening the docket for public comment is the FCC’s way of fielding the LightSquared petition.

LightSquared claimed in its December 20 petition that GPS makers sell “unlicensed and poorly designed” receivers that improperly listen to LightSquared’s airwaves.

Jim Kirkland, general counsel of Trimble Navigation Ltd. and head of the Save Our GPS Coalition, responded that Congressional directives bar the FCC from clearing LightSquared before questions of GPS interference are settled. The company’s December requests consists of “gross mischaracterization of prior FCC decisions,” Kirkland stated. “LightSquared and its predecessors have never been allowed to interfere with GPS.”

To read more click [here](#).

[<Return to top>](#)

PC World, Jan 30, 2012 2:40 pm, FCC Seeks Public Comment on LightSquared Petition, By Stephen Lawson, IDG News

The U.S. Federal Communications Commission is seeking public comment on a petition by embattled mobile startup LightSquared that says GPS receivers aren't entitled to protection from interference.

The carrier says GPS receivers, such as cellphones, car navigation units and aviation equipment, improperly use its licensed frequencies because they were built with inadequate filters. It also claims tests have been rigged to show harmful interference. After conflict between LightSquared and GPS makers heated up, last month LightSquared asked the FCC for a declaratory ruling that GPS receivers do not have the right to use its spectrum without interference.

The FCC announced the public comment period on Friday. In its public notice, the agency said comments must be submitted within 30 days, for a deadline of Feb. 27. After that, the FCC will accept responses to those comments for 15 days, or until March 13.

To read more click [here](#).

[<Return to top>](#)

Forbes.com, TECH | 1/30/2012 @ 1:39PM, AT&T: Still Coveting Dish Network's Wireless Spectrum? By Eric Savitz

For years, there has been speculation that AT&T might want to buy one of the two U.S. satellite TV providers. The concept cropped up anew after the company's bid for T-Mobile fell apart. While the original idea was that AT&T might want to own a nationwide TV content provider, there is a whole new reason for Ma Bell to covet Dish Network: they have a lot of unused wireless spectrum.

In a research note this morning, Credit Suisse analyst Stefan Anninger notes that AT&T sent a letter to the FCC essentially requesting that Dish be required to build a wireless network the company's 2 GHz spectrum assets.

"From our perspective, AT&T's Jan 26th letter indicates that T is more interested in DISH's S-band spectrum than ever," the analyst writes. "We suspect that T's interest in seeing the FCC impose Lightsquared-like buildout requirements on DISH has little to do with the public interest, and much more to do with T's interest increasing its negotiating leverage, when it comes to a potential transaction negotiation with DISH. Why? Because onerous buildout requirements, could increase DISH's interest in selling/dealing its spectrum."

To read more click [here](#).
[<Return to top>](#)

TWICE, FCC To Hear LightSquared Petition, By Joseph Palenchar -- TWICE, 1/30/2012

Washington - The Federal Communications Commission (FCC) agreed to consider LightSquared's request that it declare GPS devices are not entitled to interference protection from the LightSquared's planned 4G network as long as the network operates within FCC-established technical requirements.

The FCC asked for comments by Feb. 27 and for responses to those comments by March 13.

LightSquared, which wants to establish a terrestrial 4G LTE network in a satellite-radio band, contended that GPS makers sell "unlicensed and poorly designed" receivers that listen in on its spectrum.

For its part, the GPS industry has asked the FCC to declare that "the GPS community is not required to share responsibility for resolving interference issues" with LightSquared, the FCC noted. The industry's petition contends that LightSquared "is required to protect GPS receivers from interference caused by such terrestrial operations and that the Commission has placed the obligation to resolve harmful interference on [LightSquared]," the FCC said.

To further complicate the matter, a law passed in late 2011 prevents the FCC from green-lighting LightSquared's network until it "has resolved concerns of potential widespread harmful interference by such commercial terrestrial operations to commercially available global positioning system devices," the FCC noted.

To read more click [here](#).
[<Return to top>](#)

CNET, Is AT&T jockeying for Dish's wireless spectrum? by Marguerite Reardon January 30, 2012 2:00 PM PST

Last week, AT&T filed a request with the Federal Communications Commission stating that if the agency grants a waiver to the company that it should not include any "restrictions on the transfer and/or leasing" of the company's spectrum. The agency is also asking the FCC to impose strict network build-out requirements on the spectrum as well. It said that Dish should not be allowed to wait for specifications for new LTE technology to come out before it's required to start building its wireless broadband network.

Dish Network bought wireless spectrum through the bankruptcies of DBSD North America and TerreStar Networks. And it's planning to use the spectrum, which is supposed to be used for terrestrial and satellite purposes, to build a new 4G LTE wireless network.

Like LightSquared, another company that also wants to build an LTE network using similar satellite and terrestrial spectrum, Dish has asked the FCC for a waiver to allow it to build a network for terrestrial use only. LightSquared was granted a similar waiver last year.

Several large companies, including AT&T and Verizon Wireless, have opposed LightSquared's waiver and they also oppose the waiver for Dish. Instead of granting these waivers, these companies want the FCC to change the rules on this spectrum to allow for terrestrial-only use. AT&T expressed this sentiment in an FCC filing in November.

AT&T hasn't necessarily changed its position on the issue. The company still believes that the FCC needs to change the rules instead of granting waivers, according to a footnote in its most recent filing. But the carrier says that if the FCC decides to proceed with a waiver, it should be consistent with previous waivers. Therefore, it should impose the same restrictions that were included in the LightSquared waiver, which did have build-out requirements.

To read more click [here](#).

[<Return to top>](#)

IntoMobile, The FCC wants to hear your thoughts about LightSquared's proposed 4G LTE network, BY: STEFAN CONSTANTINESCU, INTOMOBILE, TUESDAY, JANUARY 31ST, 2012 AT 12:28 AM

LightSquared, the wireless operator run by a hedge fund, has been wanting to launch their network for the past 18 months. There's a slight problem though. The spectrum they want to use to launch said network sits way too close to the same spectrum that GPS devices use to get a satellite fix and calculate where they are on the planet. Early testing showed that GPS was effectively knocked out in anything that happened to be within 20 miles of a LightSquared cell tower, to which the company responded by saying it's not their fault, it's the fault of companies who built GPS devices that don't respect the spectrum boundaries they're supposed to be using. The ensuing back and forth between LightSquared, the FCC, and the GPS industry, has been painfully boring to watch, and now it's about to hit a new level in terms of the media not giving a rat's ass. The FCC, for reasons we don't quite understand, is interested in hearing what the public has to say about LightSquared. You all have until the 27th of February to submit your thoughts.

To read more click [here](#).

[<Return to top>](#)

Rethink Wireless, LightSquared gets reprieve, AT&T argues over Dish, FCC agrees to public consultation over the GPS interference issue, while AT&T calls for Dish's spectrum to be unencumbered, By CAROLINE GABRIEL, Published: 31 January, 2012

LightSquared may have gained a small reprieve in its battle to get approval for its LTE wholesale network. A negative decision from the FCC had seemed dangerously close a couple of weeks ago when a government agency said it could not see a solution to the problem of LightSquared's network interfering with GPS systems. Perhaps it's just dragging out the agony, but the regulator has agreed to open a public consultation on LightSquared's argument that GPS should not have legal protection from interference.

The public comment period will be open until February 27, and follow-up responses will be due by March 13. The FCC is also waiting for official interference test results, which are due soon.

Meanwhile, AT&T is arguing with the FCC over the other operator seeking to build out LTE in mobile satellite (MSS) bands, Dish Network. Dish is seeking a waiver, similar to LightSquared's, to allow it to run terrestrial-only services in its spectrum, though its MSS frequencies are further away from GPS. AT&T said in a filing that the FCC should not place restrictions on how Dish uses its spectrum - in particular, it should not impose the same rule as it did on LightSquared, that it should not sell or lease more than 25% of its spectrum capacity to AT&T or Verizon.

The stance intensified speculation that the telco may be looking to acquire the satellite-TV provider, or at least its airwaves, as a consolation prize after losing its bid to buy T-Mobile. The failure of that merger plan has left AT&T short of spectrum for LTE expansion after about 2015, the telco says. Dish has 40MHz of S-band spectrum in the 2GHz range, acquired from bankrupt MSS operators TerreStar Networks and DBSD North America.

It wrote in the submission: "Imposing restrictions on commercial activities with specific parties in this instance would be anti-competitive, discriminatory, and the height of arbitrary and capricious administrative action."

To read more click [here](#).

[<Return to top>](#)

POB Online, LightSquared Seeks Ruling to Remove GPS Protections, January 30, 2012

On December 20, 2011, LightSquared filed a petition with the FCC requesting that the commission resolve the regulatory status of commercial GPS receivers to the extent their operations may be impaired by the ancillary terrestrial component (ATC) of LightSquared's licensed operations in the 1524-1559 MHz Mobile-Satellite Service (MSS) band.

LightSquared seeks a declaratory ruling that would establish that commercial GPS devices are not entitled to interference protection from LightSquared's operations so long as LightSquared operates within the FCC's technical parameters.

On Jan. 27, the FCC opened a public comment period on the petition. The FCC will accept comments in response to LightSquared's petition through Feb. 27, 2012, and will accept replies in response to those comments through March 13, 2012. Comments regarding LightSquared's petition can be filed through IB

Docket No. 11-109. General comments regarding the regulatory status of GPS devices can be filed through ET Docket No. 10-142.

To read more click [here](#).

[<Return to top>](#)

COMMUNICATIONS DAILY, January 31, 2012 Tuesday, COMM DAILY(R) NOTEBOOK, SECTION: COMM DAILY(R) NOTEBOOK, LENGTH: 157 words

AT&T changed its tune recently toward Dish Network's request for mobile satellite service waivers that would allow Dish to use MSS spectrum terrestrially, said Credit Suisse analyst Stefan Anninger in a note to investors. AT&T doesn't push the agency to address the waiver issue through a rulemaking in a recent AT&T filing at the FCC (CD Jan 30 p9), as the carrier had before, noted Anninger. AT&T's previous filings were made before its bid to buy T-Mobile was scuttled, but now AT&T needs more spectrum and Dish could be an immediate source, said Anninger. AT&T is "more interested in DISH's S-band spectrum than ever," he said. AT&T's request that the FCC include buildout conditions similar to LightSquared has more to do with "increasing its negotiating leverage, when it comes to a potential transaction negotiation with DISH," he said. More onerous buildout conditions would increase Dish's interest in selling its spectrum, said Anninger.

[<Return to top>](#)

TR Daily, CORRECTION: LightSquared REPORT TO NTIA, 42 words, 30 January 2012

A story in the Jan. 27 edition of TRDaily said the FCC sent the National Telecommunications and Information Administration a report on LightSquared-Global Positioning System interference testing. The report was sent by the Federal Aviation Administration.

[<Return to top>](#)

CT Reports, Spectrum Sudoku: Feds Have Verizon's, AT&T's Numbers, 1138 words, 30 January 2012, By Jeffrey Silva

With prospects alive this year for congressional approval of incentive auctions, which would enable the U.S. government to compensate TV broadcasters for returned airwaves repurposed for mobile broadband, the debate has shifted to how much authority the Federal Communications Commission (FCC) should have to craft auction rules in ways that could limit the eligibility of top wireless carriers Verizon and AT&T.

Top-line messaging from FCC Chairman Julius Genachowski at this month's Consumer Electronics Show and to US mayors last week is clear and unequivocal: Congress needs to promptly approve incentive auction legislation, but should not tie the FCC's hands with respect to writing auction rules.

House Republican spectrum legislation seeks to do just that as well as well as forbid any recaptured broadcast airwaves from being set aside for unlicensed applications such as Wi-Fi. The House measure, championed by Commerce Committee Chairman Fred Upton (R-Mich.) and Communications Subcommittee Chairman Greg Walden (R-Ore.), was approved by the House in December 2011. The bill must be reconciled with legislation penned by Senate Commerce Committee Chairman Jay Rockefeller

(D-W.V.) that would allow the FCC to continue fashioning auction rules as the agency sees fit. The Rockefeller bill remains pending after committee approval in June 2011.

Republicans in recent years have been critical of FCC imposition of license bidding conditions, including those designed to promote net neutrality, public safety and small/midsize carrier access to spectrum. Republicans argue such bidding restrictions diminish the value of spectrum auctioned and thereby decrease revenue for the U.S. Treasury.

House and Senate spectrum bills, which could be considered within separate legislation to help underwrite the cost of extending the payroll tax cut and unemployment benefits, also include provisions to reallocate to first responders a slice of 700 MHz spectrum known as the D Block for development of a national public-safety wireless broadband network.

To read more click [here](#).

[<Return to top>](#)

Reuters, Sprint extends LightSquared deadline to mid-March, 236 words, 30 January 2012, 11:03

NEW YORK, Jan 30 (Reuters) - Sprint Nextel Corp has agreed to give LightSquared -- a telecom start-up backed by hedge fund manager Philip Falcone -- another month and a half to overcome interference concerns surrounding a wireless service LightSquared wants to build using Sprint equipment.

In a bid by both companies to save money on equipment costs, LightSquared and Sprint had forged an agreement in July under which LightSquared would pay Sprint \$9 billion over 11 years so it could use a network Sprint is building to offer its own high-speed wireless service.

But the deal, which is subject to LightSquared obtaining approval from the United States Federal Communications Commission, has hit some roadblocks as government tests have shown interference with satellite systems used in everything from airline navigation to agriculture.

To read more click [here](#).

[<Return to top>](#)

###