

MAR 25 2011

Mr. Julius Genachowski
Chairman
Federal Communications Commission (FCC)
445 12th Street SW
Washington, DC 20554

Dear Mr. Chairman:

The Department of Defense (DoD) and the Department of Transportation (DOT) recognize the importance of implementing a thorough and equitable operational process for the LightSquared Working Group (WG). In that regard, DoD and DOT have reviewed the Commission's expectations for the LightSquared WG process as stated in the February 25, 2011, letter (DA 11-367) to LightSquared, and have several concerns with its stipulations, which we believe require your personal attention.

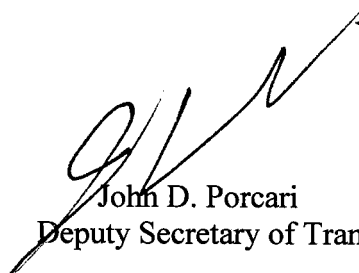
First, DoD and DOT were not sufficiently included in the development of the LightSquared initial work plan and its key milestones. We are concerned with this lack of inclusiveness regarding input from federal stakeholders. In particular, active engagement with DoD and DOT, the national stewards and global providers of the Global Positioning Satellite (GPS) service, is essential to protect this ubiquitous defense, transportation and economic utility as the WG process proceeds.


Second, the Commission's determination that consensus on the WG recommendations is not required does not provide guidance regarding how differing technical viewpoints from federal and private sector manufacturers and users will be reconciled. DoD and DOT need to understand how differing conclusions and recommendations developed during the WG process that could affect national security and transportation safety will be addressed.

Finally, DoD and DOT strongly advise that a comprehensive study of all the potential interference to GPS is needed. The new LightSquared business plan and the new FCC rules significantly expand the terrestrial transmission environment, increasing the potential for interference to GPS receivers. An exchange of all pertinent technical and operational information is also crucial to ensure the effectiveness of interference mitigation solutions.

In light of these concerns, and the importance of GPS for civil, military, and commercial users, we request clarification on these matters at your earliest opportunity.

Sincerely,


John D. Porcari
Deputy Secretary of Transportation


William J. Lynn III
Deputy Secretary of Defense

cc:

The Honorable Lawrence E. Strickling
Assistant Secretary for National Telecommunications & Information
Telecommunications & Information
Administration, Department of Commerce