

February 17, 2016

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

RE: IB Docket No. 12-340
IB Docket No. 11-109

Dear Ms. Dortch:

I am writing to urge the Commission to expedite issuing a public notice on the license modification applications submitted by Ligado Networks on December 31, 2015. The applications propose modifications of licenses for 1526-1536 MHz, 1545-1555 MHz, 1627.5-1637.5 MHz, 1646.5-1656.5 MHz, and 1670-1675 MHz as well as reallocation of 1675-1680 MHz for shared use.

The need for additional spectrum for mobile broadband is well established and a central part of the Commission's 2010 National Broadband Plan. Together with colleagues at the Technology Policy Institute, I have written extensively about the options available for increasing spectrum for broadband, stressing the important role that Mobile Satellite Service (MSS) spectrum can play in that effort.¹ I have stated previously in comments to the Commission that, of the various options available, the spectrum held by Ligado Networks (formerly LightSquared) is low-hanging fruit.²

The Commission should move this process forward by issuing a notice requesting public comment on Ligado's December 31, 2015 filings concerning license modifications and reallocation in mid-band spectrum. By incorporating limits on Ligado's operations that were agreed to by major GPS manufacturers, this proposal appears to satisfy the concerns of various stakeholders about adjacent band interference issues. I therefore urge the Commission to take the necessary steps to be able to act on Ligado's application expeditiously and move its spectrum to productive uses.

¹ See, for example, Thomas M. Lenard, Lawrence J. White and James L. Riso, "Increasing Spectrum for Broadband: What are the Options," February 12, 2010, available at <https://techpolicyinstitute.org/commentary/increasing-spectrum-for-broadband-what-are-the-options/>

² See Comments on "Ex Parte filing by LightSquared Subsidiary LLP," September 6, 2013, available at <https://techpolicyinstitute.org/wp-content/uploads/2013/09/comments-filed-with-the-federa-2007653.pdf>

Respectfully Submitted,

A handwritten signature in black ink that reads "Thomas M. Lenard". The signature is written in a cursive style with a large initial 'T'.

Thomas M. Lenard
President

cc: Mindel De La Torre
Roger Sherman