

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of

LightSquared Technical Working
Group Report

and

LightSquared Subsidiary LLC Request
For Modification of its Authority for an
Ancillary Terrestrial Component

IB Docket No. 11-109

File No. SAT-MOD-20101118-00239

**REPLY COMMENTS
OF THE
COMPUTER & COMMUNICATIONS INDUSTRY ASSOCIATION
(CCIA)**

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EXECUTIVE SUMMARY

LightSquared has invested billions of dollars to develop a nationwide LTE broadband wireless network. The network will utilize both satellite and terrestrial components to deliver wholesale mobile wireless services over its authorized L-Band spectrum. Once operational, LightSquared's network has the potential to create additional competition in an increasingly concentrated wireless marketplace; will expand high-speed broadband access to many more Americans, realizing one of the goals of the *National Broadband Plan*; achieve the Commission's goal of expanding the amount of spectrum available for mobile broadband; and spur a wave of economic growth and job creation. CCIA and many other parties support the deployment of LightSquared's network.

LightSquared has acknowledged that transmissions in the upper 10 MHz of its downlink frequencies adversely affect the performance of legacy GPS receivers. Although these interference issues are not of its own making, LightSquared has proposed a solution that will allow it to begin operating in the lower 10 MHz of its spectrum while it continues to work with the FCC, NTIA, other government agencies, and the GPS industry to resolve any remaining interference issues.

LightSquared's solution shows a willingness to reach a fair compromise. In fact, its plan was first recommended by the GPS industry less than a year ago. However, presently the GPS industry appears to be uninterested in collaborating to resolve these interference issues and has even recommended that LightSquared vacate its licensed L-band spectrum.

Allowing LightSquared to begin deployment of its satellite-terrestrial network will serve the public interest and advance the Commission's goals in many regards. Capitulation to the demands of the GPS industry will set a precedent for bad spectrum management policy, undermine greater broadband deployment to underserved areas, waste valuable spectrum resources, frustrate economic growth and job creation, and stifle potential competition in the wireless market. For these reasons CCIA urges the Commission to accept LightSquared's recommendation to allow it to commence service in the lower 10 MHz of its spectrum, and to work with LightSquared, other government agencies, and stakeholders to broker a solution so that LightSquared can fully deploy its nationwide network as soon as possible.

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The Computer & Communications Industry Association (“CCIA”) files these Reply Comments regarding the LightSquared Technical Working Group Report (“TWG Report”) filed on June 30, 2011.¹ The record in this proceeding demonstrates that the Federal Communications Commission (“FCC” or “Commission”) should approve LightSquared’s proposed recommendation (“Recommendation”)² and allow LightSquared to commence operations on the lower 10 MHz of its licensed spectrum. Further, CCIA urges the Commission to work with LightSquared and other government agencies to reach a longer-term solution enabling LightSquared to deploy new network infrastructure, using its full complement of terrestrial frequencies at appropriate power levels, so that it can provide new LTE broadband capacity to its customers while not interfering with GPS devices operating within their allotted spectrum bandwidth.

I. THE RECORD DEMONSTRATES THAT LIGHTSQUARED’S RECOMMENDATION REPRESENTS A WILLINGNESS TO REACH A FAIR COMPROMISE

CCIA demonstrated in its Comments that LightSquared’s Recommendation represents a willingness to reach a fair solution to GPS interference problems on its network.³ Further, CCIA called on the Commission to work with LightSquared, the

¹ IB Docket No. 11-109, SAT-MOD-20101118-00239, *LightSquared Subsidiary LLC Request for Modification of its Authority for an Ancillary Terrestrial Component*, Final Report (June 30, 2011) (“TWG Report”), available at <http://fjallfoss.fcc.gov/ecfs/document/view?id=7021690471>.

² IB Docket No. 11-109, Recommendation of LightSquared Subsidiary LLC (June 30, 2011) (“Recommendation of LightSquared”), available at <http://fjallfoss.fcc.gov/ecfs/document/view?id=7021690470>.

³ IB Docket No. 11-109, Comments of the Computer & Communications Industry Association (“CCIA”) at 1-3 (July 29, 2011).

National Telecommunications and Information Administration (“NTIA”), and stakeholders to reach a long-term solution so that LightSquared can deploy its new 4G LTE mobile wireless network.⁴ Many parties made the same request.⁵

A. The GPS Industry Is Currently Unwilling to Work with LightSquared, the FCC, NTIA, and Other Stakeholders to Resolve Remaining Issues

The GPS industry has indicated through its comments that it is unwilling to work with LightSquared to find a solution to the remaining GPS interference problems. Instead of seeking to work with LightSquared, the Commission, other government agencies, and other stakeholders to find a solution to the interference issues adversely affecting the performance of legacy GPS receivers, the GPS industry urges the Commission to rescind LightSquared’s waiver to offer terrestrial broadband service in LightSquared’s licensed L-band spectrum.⁶

The GPS industry’s intransience comes despite the fact that less than a year ago the U.S. GPS Industry Council (“USGIC”) proposed a solution to interference problems that is the same as the Recommendation that LightSquared proposed in June 2011.⁷ As

⁴ *Id.* at 1,3.

⁵ IB Docket No. 11-109, Comments of AT&T at 3 (Aug. 1, 2011); Comments of the Kentucky County Attorneys Association at 1 (July 26, 2011); Comments of New America Foundation, Free Press, Public Knowledge, and Media Access Project at 4, 7, 15 (Aug. 1, 2011) (“Public Interest Organizations”); Comments of the Quest Company at 1-2 (July 29, 2011).

⁶ IB Docket No. 11-109, Comments of The U.S. GPS Industry Council at 52 (Aug. 1, 2011); Comments of Coalition to Save Our GPS at 48-49 (Aug. 1, 2011).

⁷ See ET Docket No. 10-142, *Fixed and Mobile Services in the Mobile Satellite Service Bands at 1525-1559 MHz and 1626.5-1660.5 MHz, 1610-1626.5 MHz and*

one commenter points out, it appears that the commercial GPS industry has abandoned efforts to work with LightSquared and the FCC and now advocates denying the public 4G LTE mobile broadband deployment in the L-band altogether.⁸

B. A Broad Range of Stakeholders Support LightSquared's Recommendation and Have Asked the FCC to Broker a Resolution

In June LightSquared responded to relatively new concerns about interference with commercial GPS devices by proposing a Recommendation that would allow it to commence terrestrial operations on the lower 10 MHz of its spectrum, while working with the FCC, NTIA, other government agencies, and other stakeholders to explore longer-term options that would allow LightSquared to use its full complement of terrestrial frequencies operating at appropriate power levels, so it could launch its 4G LTE mobile broadband service.⁹

In its Comments, CCIA urged the Commission to accept LightSquared's Recommendation and allow it to commence operations of its 4G LTE mobile broadband network on the lower 10 MHz of its licensed spectrum.¹⁰ Other parties echoed this sentiment.¹¹

2483.5-2500 MHz, and 2000-2020 MHz and 2180-2200 MHz, Comments of USGIC at 13-14 (Sept. 15, 2010).

⁸ Comments of Public Interest Organizations at 5.

⁹ Recommendation of LightSquared at 24-27.

¹⁰ Comments of CCIA at 1.

¹¹ IB Docket No. 11-109, Comments of Leap Wireless Int'l, Inc. ("Leap") and Cricket Communications, Inc. ("Cricket") at 4 (July 30, 2011); Comments of SI Wireless at 3 (July 22, 2011).

In contrast to the GPS community, LightSquared seeks to work with the Commission, NTIA, and industry stakeholders to find a long-term solution to interference problems. LightSquared has acknowledged that transmissions in the upper 10 MHz of its downlink frequencies adversely affect the performance of legacy GPS receivers and hopes to work with all stakeholders to resolve this issue.¹² Deployment of LightSquared's wholesale 4G LTE mobile broadband network is supported by a broad range of parties,¹³ and LightSquared's Recommendation is a fair approach that will both allow limited, initial deployment and for stakeholders to continue to work to solve any remaining interference issues so that LightSquared may eventually deploy on its full range of licensed spectrum. This approach is fair and the Commission should agree to it.

II. THE RECORD MAKES CLEAR THAT ALLOWING LIGHTSQUARED TO DEPLOY ITS NETWORK WOULD PROMOTE THE EFFICIENT USE OF WIRELESS SPECTRUM

CCIA demonstrated in its Comments that LightSquared's Recommendation that it work with the Commission, NTIA, other government agencies and stakeholders to find a solution to remaining interference problems with commercial GPS devices would promote the efficient use of spectrum resources. Further, allowing LightSquared to move

¹² Recommendation of LightSquared at 1, 4-5.

¹³ See Comments of Leap and Cricket at 1-2; Comments of SI Wireless at 3; IB Docket No. 11-109, Comments of Newport Development Commission (July 21, 2011); Comments of Open Range Communications, Inc. ("Open Range") at 5 (Aug. 1, 2011); Comments of Arkansas State Rep. Hudson Hallum (July 26, 2011); Comments of Chief of Police John McGovern, Excelsior Springs, Missouri (July 12, 2011); Comments of Director Mark Schoenbaum, Office of Rural Health and Primary Care, Minnesota Department of Health (Aug. 1, 2011).

forward and deploy its network would help the Commission meet its goal to increase the amount of spectrum available for wireless broadband use.¹⁴

A. The Commission Has Called for the Utilization of Additional Wireless Spectrum for Mobile Broadband

In the *National Broadband Plan*, the Commission was explicit on the need to make additional wireless spectrum available for commercial broadband use if America is to capitalize on the potential for wireless broadband to be a transformative platform.¹⁵ The *National Broadband Plan* calls for the Commission to make 500 Mhz of spectrum available over the next decade, including making 90 Mhz of spectrum currently allocated for Mobile Satellite Services (“MSS”) available for terrestrial deployment.¹⁶

B. LightSquared’s Plan Would Efficiently Utilize Valuable Spectrum Resources

In its Waiver Order, the FCC concluded that interference to GPS devices was caused by GPS equipment failing to reject transmissions on LightSquared’s adjacent spectrum.¹⁷ Although the ongoing interference problems are not of its own making, LightSquared has voluntarily modified its plan to use a different part of its spectrum,

¹⁴ Comments of CCIA at 7-11.

¹⁵ FCC, CONNECTING AMERICA: THE NATIONAL BROADBAND PLAN 75 (2009) (“NATIONAL BROADBAND PLAN”).

¹⁶ *Id.* at 84, 87.

¹⁷ See DA Docket No. 11-133, SAT-MOD-20101118-00239, *LightSquared Subsidiary LLC Request for Modification of its Authority for an Ancillary Terrestrial Component*, Order and Authorization, 21 ¶ 42 (Jan. 26, 2011).

obtained the necessary spectrum to carry out its modified plans,¹⁸ and is prepared to spend \$100 million to renegotiate, reengineer, and reconfigure its wireless channels to mitigate interference with GPS receivers.¹⁹

Under LightSquared's solution, its terrestrial operations will be 23 MHz away from the bottom of the GPS band. 23 MHz of separation is sufficient so that most GPS receivers – even those without adequate filters – will not be susceptible to overload. Further, GPS receivers designed to “listen in” on L-band frequencies can co-exist with LightSquared's network, and LightSquared has committed to work with GPS device manufacturers, Inmarsat, and filter manufacturers to find solutions to resolve overload issues that might occur for GPS devices.²⁰

LightSquared's plan is widely supported by the public safety community.²¹ LightSquared's satellite-terrestrial network will enhance the reliability of communications for the first responders and emergency personnel. Particularly, LightSquared's network will enable first responders to be more effective and safe when traditional telecommunications networks are disabled – a more important and efficient use of spectrum resources cannot be envisaged.

¹⁸ Recommendation of LightSquared at 4-5.

¹⁹ IB Docket No. 11-109, Comments of LightSquared at 13 (Aug. 1, 2011).

²⁰ *Id.* at 13-14.

²¹ See Comments of Arkansas State Rep. Hudson Hallum; Comments of Chief of Police John McGovern, Excelsior Springs, Missouri; IB Docket No. 11-109, Comments of Councilman Dick Davis, Kansas City, Missouri (July 19, 2011); Comments of Sheriff Michael Saudino, Bergen County, New Jersey (July 28, 2011).

C. Failure to Allow LightSquared to Deploy its Network in the L-band Will Create Precedent for Bad Spectrum Management Policy

Failure by the Commission to broker a solution that allows LightSquared to deploy its wholesale wireless network will undermine the Commission's broadband goals and set a dangerous precedent for spectrum management policy, essentially honoring "squatters' rights" on valuable and already licensed spectrum.

As other parties point out, the benefits that will flow from LightSquared's buildout and wholesale network are critical to the Commission achieving its broadband goals.²² Repurposing MSS spectrum for high-capacity mobile broadband accounts for approximately one-third of all non-federal spectrum (90 of 270 MHz) identified in the *National Broadband Plan* as the most promising option to address the coming spectrum shortage. By itself, the L-band represents 40 MHz of the non-federal spectrum the Commission anticipated would be available for mobile broadband.²³ The Commission will be unable to accomplish its broadband expansion goals if it does not work with LightSquared and the GPS industry to mitigate interference problems and allow LightSquared to deploy its network on its licensed spectrum.²⁴

In addition to undermining the Commission's goals on broadband deployment, capitulation by the Commission to the GPS industry would create a dangerous precedent

²² Comments of Public Interest Organizations at 11.

²³ *Id.* at 12; Comments of Lightsquared at 5 (citing NATIONAL BROADBAND PLAN at 84).

²⁴ Comments of Public Interest Organizations at 10.

for spectrum management that essentially recognizes “squatters’ rights” on spectrum that the GPS industry is not licensed to use. Other parties recognize this problem as well.²⁵

Failing to find a solution that allows LightSquared to deploy its full satellite-terrestrial network will effectively allow the GPS industry to appropriate LightSquared’s licensed spectrum. As a result, the L-band would be unusable for mobile broadband. Further, blocking LightSquared’s terrestrial operations on the L-band would set a dangerous precedent for other spectrum bands, such as the AWS bands, that are potentially available for broadband purposes provided that adjacent-band technical issues can be resolved.²⁶

As CCIA’s Comments point out, denying LightSquared’s Recommendation will have far reaching ramifications beyond LightSquared.²⁷ If the GPS industry successfully forces LightSquared off its licensed spectrum, other investors will be unlikely to attempt to use MSS spectrum for terrestrial service. Moreover, the Commission’s decision could adversely impact other spectrum relocation plans, such as those for TV broadcast spectrum. Failure by the Commission to find a workable solution in this instance could impair investment and buildout in approximately 200 MHz of the 500 MHz of spectrum that the *National Broadband Plan* calls for in order to meet growing broadband spectrum demand. Such an outcome is unsound spectrum policy, as it would impair the Commission’s ability to fulfill its broadband policy goals and cause significant economic harm.

²⁵ See *id.* at 6; Comments of LightSquared at 5.

²⁶ Comments of Public Interest Organizations at 5.

²⁷ See Comments of CCIA at 10-11.

III. THE RECORD DEMONSTRATES LIGHTSQUARED'S PLAN WOULD RESULT IN INCREASED COMPETITION IN THE WIRELESS BROADBAND MARKET

In its Comments, CCIA demonstrated that allowing LightSquared to deploy its wholesale mobile voice and broadband network would create another facilities-based provider of wireless services and could significantly advance the Commission's goal of promoting competition in the wireless marketplace.²⁸ As CCIA points out, in its 2010 and 2011 annual reports on wireless competition, the Commission was *unable* to conclude that the wireless market is effectively competitive.²⁹

A. LightSquared's Network Will Allow Rural and Local Wireless Providers to Compete More Effectively

Other parties also commented that LightSquared's wholesale 4G LTE mobile broadband network could increase competition into the wireless marketplace. Wireless carriers such as Leap and Cricket believe that the deployment of LightSquared's wholesale network could create additional competition in the wireless marketplace, which is vital in light of the strengthening AT&T/Verizon duopoly.³⁰ Even AT&T,

²⁸ *Id.* at 3-5. (citing WT Docket No. 09-66, *Implementation of Section 6002(b) of the Omnibus Reconciliation Act of 1993, Annual Report and Analysis of Competitive Market Conditions With Respect to Mobile Wireless, Including Commercial Mobile Services*, Fourteenth Report, FCC 10-81, 25 FCC Rcd. 11407 ¶ 1 (May 20, 2010) ("Fourteenth Report").

²⁹ *Id.* (citing Fourteenth Report at 25 FCC Rcd. 11429 ¶ 6, 11623 ¶ 368; WT Docket No. 10-133, *Implementation of Section 6002(b) of the Omnibus Reconciliation Act of 1993, Annual Report and Analysis of Competitive Market Conditions With Respect to Mobile Wireless, Including Commercial Mobile Services*, Fifteenth Report, FCC 11-103 5 ¶ 2, 28 ¶ 15 (June 27, 2011)).

³⁰ Comments of Leap and Cricket at 4.

typically a staunch opponent to competition, asserts that if LightSquared is able to deploy its network, LightSquared's wholesale services may create more robust competition for wireless broadband services.³¹ SI Wireless, a small rural carrier, points out that LightSquared's network, once deployed, will offer wholesale 4G roaming services, which will give rural carriers "the ability to compete more effectively with carriers with a nationwide footprint which currently dominate the market."³² SI Wireless also notes that LightSquared's wholesale network would enable rural carriers to access essential services their customers demand, such as nationwide data roaming, from a provider that rural carriers do not compete against on the retail level. As a result, LightSquared's network has the potential to strengthen smaller carriers' ability to compete.³³

Public interest organizations also assert that LightSquared's network could reinvigorate competition in the wireless marketplace. The New America Foundation, Free Press, Public Knowledge, and Media Access Project assert that the lack of wireless competition has restricted innovation and investment, leading to high prices and low service quality. Additionally, they stress that LightSquared's wholesale wireless network could alleviate some of the problems that make it difficult for regional and local carriers to compete against their national competitors.³⁴

³¹ Comments of AT&T at 2.

³² Comments of SI Wireless at 1.

³³ *Id.* at 2.

³⁴ Comments of Public Interest Organizations at 12-13.

B. Consumers and Businesses Stand to Reap the Benefits from Increased Competition in the Wireless Market

In addition to wireless carriers and public interest organizations, the business community also supports LightSquared's deployment as a potential means to spur competition in the wireless industry. The Newport Economic Development Commission notes that LightSquared's wholesale service will result in increased competition, creating benefits for consumers.³⁵ And the Ohio Association of McDonald's Operators writes that LightSquared's network will increase competition in the wireless sector and benefit businesses because, "[a]s competitors enter, prices will drop and businesses will benefit."³⁶

The record is clear – allowing LightSquared to deploy its wholesale mobile voice and broadband network could strengthen competition in the wireless marketplace. Increased competition via LightSquared's wholesale network could “enable multiple entities – retailers, rural and other geographically limited communications service providers, cable operators, device manufacturers, online content providers and others – the opportunity to provide wireless broadband services to their customers.”³⁷ Further, consumers stand to benefit from competition through lower prices and increased innovation.

³⁵ Comments of Newport Economic Development Commission.

³⁶ IB Docket No. 11-109, Comments of Ohio Association of McDonald's Operators (July 13, 2011).

³⁷ Comments of LightSquared at 11.

IV. THE RECORD DEMONSTRATES THAT LIGHTSQUARED’S PLAN WOULD EXPAND HIGH SPEED BROADBAND ACCESS TO NEARLY ALL AMERICANS AND FULFILL THE COMMISSION’S GOALS IN THE *NATIONAL BROADBAND PLAN*

CCIA Comments make it clear that allowing LightSquared to deploy its wholesale mobile broadband network would expand access to high-speed broadband to nearly all Americans and help the Commission achieve its goal to expand wireless broadband services in rural, unserved, and underserved areas.³⁸

A. The Obama Administration and the Commission Have Prioritized Expanding Broadband Services to Nearly All Americans

As the Commission has noted, as many as twenty-six million Americans live in areas unserved by high-speed broadband, and many live in areas where there is no business case for service providers to extend broadband services.³⁹ In order to expand broadband to underserved areas, the Administration and the Commission plan to reform the Universal Service Fund (“USF”) to make 4G broadband available to 98% of Americans within five years.⁴⁰

³⁸ See Comments of CCIA at 5-6.

³⁹ GN Docket No. 10-159, *Inquiry Concerning the Deployment of Advanced Telecommunications Capability to All Americans in a Reasonable and Timely Fashion, and Possible Steps to Accelerate Such Deployment Pursuant to Section 706 of the Telecommunications Act of 1996, as Amended by the Broadband Data Improvement Act*, Seventh Broadband Progress Report and Order on Reconsideration, FCC 11-78 2 ¶ 1 (May 20, 2011).

⁴⁰ See Press Release, Office of the Press Secretary, The White House, President Obama Details Plan to Win the Future Through Expanded Wireless Access (Feb. 10, 2011); GN Docket No. 11-16, *Bringing Broadband to Rural America: Update to Report on Rural Broadband Strategy*, 4 ¶ 5 (June 17, 2011) (“Update to Report on Rural Broadband Strategy”).

B. Stakeholders Agree that LightSquared's Network Will Extend Broadband Services to Unserved Areas

In their comments, other parties also note that the deployment of LightSquared's wireless broadband network would spur the expansion of broadband services to rural America. LightSquared itself claims that its network will cover at least 260 million people by the end of 2015, which will extend broadband services to many unserved Americans and help close the digital divide.⁴¹ Open Range Communications asserts that LightSquared's L-band spectrum is an ideal platform for carriers to deliver wireless broadband services to rural areas because LightSquared's wholesale network will make it economical to deliver broadband where it presently does not make economic sense to do so.⁴² Local government agencies and elected officials are also supportive of LightSquared's deployment and tout the benefits of broadband deployment to rural areas for improving the delivery of health care services,⁴³ allowing businesses to expand into rural areas and create jobs,⁴⁴ and leveling the economic playing field for rural communities.⁴⁵

The record is clear – LightSquared's nationwide wholesale wireless broadband network will go far toward closing the digital divide. In order to meet its goals of

⁴¹ Comments of LightSquared at 12.

⁴² Comments of Open Range at 4.

⁴³ Comments of Director Mark Schoenbaum, Office of Rural Health and Primary Care, Minnesota Department of Health.

⁴⁴ IB Docket No. 11-109, Comments of Minnesota State Rep. John Ward (July 22, 2011).

⁴⁵ Comments of Kentucky County Attorneys Association at 1.

expanding wireless broadband services to nearly all Americans, the FCC should allow LightSquared to begin initial deployment of its network and work with LightSquared, other government agencies, and other stakeholders so that LightSquared can deploy its network on its full range of spectrum.

V. THE RECORD CLEARLY SHOWS THAT THE DEPLOYMENT OF LIGHTSQUARED'S NETWORK WOULD SPUR ECONOMIC GROWTH AND JOB CREATION

CCIA agrees with the FCC Chairman and others who point out that the deployment of LightSquared's network will lead to economic growth and jobs and provide a needed boost to the American economy.⁴⁶ In building its wholesale network, LightSquared has developed the wireless infrastructure that will serve as a catalyst for economic growth and job creation. Once deployed, the network will create numerous opportunities for growth in the wireless industry amongst those providing wireless services, developing content, designing devices, and engaging in e-commerce. Additionally, as discussed above, LightSquared's network will extend broadband to unserved areas. The expansion of broadband to these areas will allow the wireless ecosystem to reach new customers and for businesses in previously unserved areas to access the global market to sell goods and services.

A. The Commission Acknowledges that Deployment of LightSquared's Network Will Promote Economic Growth and Job Creation

⁴⁶ Comments of CCIA at 11-12.

The Commission has made clear that expanding broadband services will create economic growth, as well as other public interest benefits. In its 2011 *Update to Report on Rural Broadband Strategy*, the Commission said that a strong broadband infrastructure can drive a myriad of benefits and opportunities for Americans, including “education, worker training, private-sector investment, entrepreneurial activity, job creation, and economic growth”⁴⁷

Chairman Genachowski has even directly stressed the economic benefits of LightSquared’s deployment. In May Chairman Genachowski wrote, “the opportunity presented by LightSquared ... would result in billions of dollars of new private investment and the creation of tens of thousands of jobs.”⁴⁸

B. Other Parties Agree that Deployment of LightSquared’s Network Will Lead to Economic Growth and Job Creation

Like CCIA, other parties assert that LightSquared’s network, once deployed, will lead to economic growth and job creation. LightSquared asserts that launching its terrestrial network will require an investment of more than \$25 billion; contribute approximately \$120 billion in benefits to U.S. consumers; and invigorate the American economy with new jobs, innovation, and services.⁴⁹

⁴⁷ Update to Report on Rural Broadband Strategy at 2 ¶ 2 (citing 47 U.S.C. § 1305(k)(2)(D)).

⁴⁸ Letter from Julius Genachowski, Chairman, FCC, to Charles E. Grassley, U.S. Senator at 3 (May 31, 2011).

⁴⁹ Comments of LightSquared at 12.

Public interest organizations write that LightSquared's wholesale network is designed to promote competition in the wireless market, which, if realized, would lead to increased innovation, consumer welfare, and job creation in the wireless sector.⁵⁰ The Quest Company estimates that investments by LightSquared will infuse at least \$14 billion into the economy and provide \$120 billion in benefits to American consumers over the long run.⁵¹ Further, LightSquared's wholesale network will help close the digital divide and has the potential to strengthen competition in the wireless marketplace, spurring greater innovation, growth, and job creation.

Deployment of LightSquared's network will undoubtedly create jobs and spur economic activity, both within and beyond the wireless sector. Thus, the Commission should move quickly to allow LightSquared to begin operation of its network and work with LightSquared and other stakeholders to resolve remaining interference issues that delay full deployment and the economic benefits that will follow.

CONCLUSION

The record in this proceeding demonstrates that by allowing LightSquared to commence operation of its network in the lower 10 MHz of its spectrum and brokering a solution to interference problems with commercial GPS devices that will allow LightSquared to fully deploy its network, the Commission will realize its goals of increasing the efficient use of spectrum resources for commercially valuable uses and expanding high-speed broadband access to more Americans. Additionally,

⁵⁰ Comments of Public Interest Organizations at 14.

⁵¹ Comments of the Quest Company at 1.

LightSquared's wholesale network has the potential to strengthen competition in the wireless marketplace. Finally, reaching a compromise that allows LightSquared to fully deploy its network will spur economic growth and job creation. CCIA strongly urges the Commission to work with LightSquared so that it may fully deploy its network and so Americans can realize the benefits of additional competition and connectivity.

Dated: August 15, 2011

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