

Brian Raymond
Director
Technology Policy

March 11, 2011

The Honorable Julius Genachowski
Chairman
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: LightSquared Application Request for Modification of Its Authority for Ancillary Terrestrial Component (ATC) (FCC File No. SAT-MOD-20101118-00239)

Dear Mr. Chairman:

The National Association of Manufacturers (NAM) -- the largest manufacturing association in the United States representing manufacturers in every industrial sector and in all 50 states -- is concerned with the Federal Communications Commission (FCC) International Bureau's recent Waiver Order authorizing on the LightSquared's modification of its operating authority as a mobile-satellite service to a terrestrial-based service.

NAM members increasingly rely on an unrestricted Global Positioning System (GPS) for a variety of applications and functions essential to safety and competitiveness. Manufacturers, in conjunction with wholesale and retail locations, use GPS technology to support both parts and whole goods inventory tracking with increasing frequency. This drives efficiency, timeliness of delivery and transportation cost control, all of which lead to better asset management and increased customer satisfaction. GPS technology also is essential to ensuring accurate and timely delivery of inputs through the manufacturing supply chain. Consequently, manufacturers want to ensure that LightSquared's request to operate as a non-integrated, terrestrial-based mobile service do not pose harmful interference to GPS and other Radio-navigation satellite service (RNSS) receivers and the creation of an electromagnetic environment detrimental to GPS services and users.

We ask the FCC to seriously consider concerns raised by GPS and RNSS stakeholders and other federal agencies prior to Lightsquared's conditional approval. We urge the FCC to expeditiously address filings seeking Commission review of that order.

In addition, as strong champions of the Federal Aviation Administration's multi-billion Next Generation Air Transportation System (NextGen) modernization effort, manufacturers are concerned with the possible harmful communications interference to aviation and impacts to aviation safety as we evolve to a satellite-based air traffic management system. The FCC must do its utmost to ensure it protects the successful implementation trajectory of the NextGen program to ensure the safety of the flying public and the health of our aviation transportation and related industries.

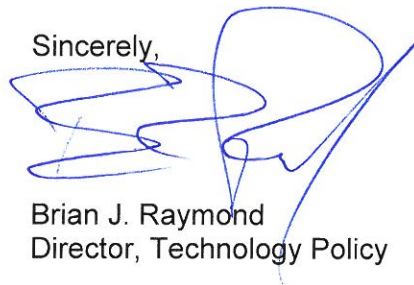
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The NAM strongly urges the FCC to address concerns raised by affected industries and federal agencies, specifically, comments from the U.S. Department of Transportation, the agency ultimately responsible for aviation safety as well as the lead civilian agency for space-based Positioning, Navigation and Timing (PNT) issues. The safety issues and impacts to GPS applications for aviation, land and maritime should provide enough incentive to the FCC to thoroughly address the concerns raised.

Thank you in advance for considering our request on this important issue to manufacturers.

Sincerely,

A handwritten signature in blue ink, appearing to read "Brian J. Raymond", with a large, stylized flourish extending upwards and to the right.

Brian J. Raymond
Director, Technology Policy