October 27, 2020

The Honorable Roger Wicker
Chairman
Committee on Commerce, Science, and Transportation
United States Senate
Washington, DC 20510

The Honorable Maria Cantwell
Ranking Member
Committee on Commerce, Science, and Transportation
United States Senate
Washington, DC 20510

Dear Chairman Wicker and Ranking Member Cantwell:

We write to you today to express our profound concern over the Federal Communications Commission's ("Commission") flawed *Ligado Order*[1] that, if left in place, would upend decades of sound spectrum policy, negatively impact a significant cross-section of commercial, federal, and academic users who rely on the many different L-band satellite services, and threaten the safety of most Americans. As you know, L-Band satellite services are "fundamental to the Nation's economy, national security, and continued technological leadership."[2] We therefore respectfully request your Committee's assistance in ensuring that the Commission reconsider its decision to allow a harmful terrestrial network to be built using L-band spectrum.

Operators and users of L-band satellite systems have relied on a stable spectrum environment free from harmful interference to deploy their networks and conduct their operations that depend upon those networks. Ligado's proposed terrestrial network would fundamentally put the vital L-band satellite communications services—that in some instances serve as the only way to reach even the most remote regions of the world and are critical to safe aviation—at risk. In addition, the proposed Ligado network would disrupt the reliability of satellite communications services and the many critical applications that rely upon Global Positioning System ("GPS"), which has direct implications for safety-of-life in commercial aviation operations, precision farming and irrigation management that have revolutionized the agriculture economy, autonomous ground and air vehicles that will bring a new generation of transportation, precise and actionable weather data that can predict hurricanes and other life-threatening natural events, and many other applications. Simply put, the *Ligado Order* failed to take full account of the diverse services in the L-band, including those relied on by military, federal, and public safety users, that would be stranded or significantly impaired (without available alternatives) by the harmful interference caused by Ligado's proposed terrestrial network.

The L-band is heavily and efficiently utilized by the undersigned organizations and companies. Regrettably, the *Ligado Order* is predicated on an insufficient appreciation for the real-world risks of harmful interference and the impacts that interference would have on our organizations, fourteen federal agencies and departments, and the broad cross-section of the American people we serve. Should Ligado be allowed to deploy its proposed network, our experience and analyses demonstrate that it could result in the degradation of the safety-of-life and the many more satellite services provided over L-band spectrum. These concerns have culminated in the almost unprecedented step of the National Telecommunications

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[1] In the Matter of Ligado Amendment to License Modification Applications IBFS File Nos. SESMOD-20151231-00981, SAT-MOD-20151231-00090, and SAT-MOD-20151231-00091, Order and Authorization, IB Docket No. 11-109, FCC 20-48 (Apr. 22, 2020).

[2] Letter from Douglas W. Kinkoph, Deputy Assistant Secretary (Acting), NTIA, to Ajit Pai, Chairman, FCC (Dec. 6, 2019).

and Information Administration ("NTIA") asking the Commission to reconsider its decision based on the detrimental effect Ligado's proposed new adjacent band terrestrial operations would have.[3]

We therefore request your direct involvement to protect the satellite communications and GPS services that we provide and are relied on by tens of millions of Americans every day. We urge you to work with the Commission to set aside the flawed *Ligado Order* in favor of a process that is responsive to the concerns of the incredibly broad cross-section of L-band operators and users representing the aviation, aerospace, agriculture, GPS, ground transportation, mapping, marine, metrological, public safety, satellite communications, and surveying industries and professions. We look forward to continuing our dialogue with you and thank you for your consideration.

Respectfully submitted,

AccuWeather, Inc.
Aerospace Industries Association (AIA)
Agricultural Retailers Association
Aircraft Electronics Association
Airbus
Aircraft Owners and Pilots Association (AOPA)
Aireon
Airlines For America
Air Line Pilots Association, International
ALERT Users Group
Allegiant Air
American Association of Airport Executives
American Association of Port Authorities
American Farm Bureau Federation
American Geophysical Union (AGU)
American Meteorological Society (AMS)
American Rental Association
American Road & Transportation Builders Association
American Soybean Association
American Sportfishing Association
American Trucking Associations
American Weather and Climate Industry Association (AWCIA)
Associated Equipment Distributors
Association of Equipment Manufacturers
Association for Unmanned Vehicle Systems International
Aviation Spectrum Resources, Inc. (ASRI)
Blue Origin
BoatU.S.
CalAmp
Cargo Airline Association
Center for Sportfishing Policy
CNH Industrial
CoBANK
Helicopter Association International (HAI)
Hellen Systems
Intelligent Transportation Society of America
International Air Transport Association
Iridium
Marine Retailers Association of the Americas
Micorom Environmental
Narayan Strategy
National Air Carrier Association
National Defense Industry Association
National Air Traffic Controllers Association (NATCA)
National Air Transportation Association
National Agricultural Aviation Association
National Society of Professional Surveyors (NSPS)
National Weather Association (NWA)
NetJets Association of Shared Aircraft Pilots (NJASAP)
NEXA Capital Partners, LLC
PlanetiQ
Polar Air Cargo Worldwide
Regional Airline Association
Resilient Navigation and Timing Foundation
Seafarers International Union
The Semaphore Group
Space Science and Engineering Center (SSEC) at the University of Wisconsin- Madison
Spire Global
Spirit Airlines
SKYTRAC
Southwest Airlines Pilots Association
Subsurface Utility Engineering Association (SUEA)
Sun Country Airlines
Trimble

[3] Petition for Reconsideration or Clarification of NTIA, IB Docket Nos. 12-340, et al., at 1 (May 22, 2020).

Crown Consulting Inc.
Cubic
DTN
Equipment Dealers Association
Frontier Airlines
FLYHT Aerospace Solutions Ltd.
General Aviation Manufacturers Association
GeoOptics, Inc.
Geospatial Equipment & Technology Institute (GETI)
University Corporation for Atmospheric Research (UCAR)
USA Rice
U.S. Contract Tower Association
U.S. Geospatial Executives Organization (U.S. GEO)
Vertical Flight Society
Weather Elevate