

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

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

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