



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

**RE: Comments to the LightSquared Technical Working Group Report
IB Docket 11-109**

Dear Ms. Dortch:

I am writing on behalf of the 230 member airlines of the International Air Transport Association (IATA) to reiterate our strong opposition to LightSquared Subsidiary LLC's planned deployment of a broadband system that will operate in frequencies adjacent to those used for the Global Positioning System (GPS).

The recent Technical Working Group report and the recommendations made by LightSquared to address the problems identified therein, as well as the assurances of a representative of LightSquared in testimony before the U.S. Congress, have only served to further emphasize that such a deployment would pose significant and unacceptable interference to GPS. It is clear to IATA that the proposed network would disrupt GPS signals, making it impossible for aviation to rely on GPS for critical navigation and positioning services that are essential for aviation safety.

In addition to threatening existing aviation operational capabilities, the proposed LightSquared system raises significant implications for the successful deployment of the Next Generation Air Transportation System (NextGen). IATA and the commercial aviation industry generally have been strong supporters of NextGen and other similar programs being deployed around the world which use satellite-based technology to promote a safer, more efficient, and more environmentally sound global aviation system. LightSquared's application serves as a direct and significant threat to this critical air traffic system upgrade.

Although considered a U.S. asset, GPS and the navigation and positioning services it enables has become an essential part of a global aviation infrastructure that is relied upon by the foreign carriers who fly in to and out of the U.S. on a daily basis. To threaten the reliability of these services is quite simply unacceptable and would raise considerable international ramifications.

LightSquared has proposed the idea of "filtering" GPS receivers in order to allow its network to operate as planned. This is not realistic. The concept has not been studied, and even if it were believed possible to do, it would take many



years and would likely be very expensive to plan and implement. IATA does not support consideration of this alternative, nor would its member airlines support funding such an expensive alternative.

In conclusion, the potential impacts of the planned LightSquared deployment to GPS and the international aviation infrastructure it supports are wholly unacceptable. As such, LightSquared must be required to move to other frequencies that do not interfere with GPS or other critical systems used for aviation safety.

Thank you in advance for your consideration.

Sincerely,

A handwritten signature in black ink, which reads "Douglas E. Lavin". The signature is written in a cursive style with a large, prominent initial "D".

Douglas E. Lavin

Regional Vice President, North America
International Air Transport Association
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