

July 28, 2011

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

**Subject: JAXA Response to FCC Public Notice IB Docket No. 11-109
(Comments regarding the LightSquared Technical Working Group Report)**

Dear Ms. Dortch

I am writing to express our concerns about the LightSquared system that is proposed for operation in frequencies immediately below the radio navigation-satellite service (RNSS) allocation at 1559-1610MHz.

Japan Aerospace Exploration Agency (JAXA) is now operating experimental radio navigation satellite system called QZSS (Quasi Zenith Satellite System). QZSS broadcasts GPS-interoperable signals and augmentation signals as well as original Japanese signals from an inclined, elliptical geosynchronous orbit. Using this system, users around Japan and Oceania can make use of seamless positioning, navigation, and timing services, even in urban canyons and mountainous areas. The system has been designed based on existing GPS service (same frequencies of GPS are used in the band of 1559-1610MHz), therefore allocated band of 1559-1610MHz for RNSS, particularly GPS/L1 frequency band has to be considered whether the frequency band could be affected from the frequencies planned by LightSquared Subsidiary since the proposed frequencies are immediately below the radionavigation-satelliteservice (RNSS) allocation at 1559-1610MHz.

In particular, QZSS system has monitoring stations in Hawaii and Guam that receive QZSS & GPS navigation signal. So, it would be necessary to perform evaluation if the LightSquared system could affect to the monitoring stations in Hawaii and Guam. For reference, the location of the monitoring stations is as follows.

Hawaii: 159.6650 degrees W, 22.1262 degrees N

Guam: 144.7948 degrees E, 13.4774 degrees N

We are expecting that GPS service provider evaluate those kind of potential impact to the existing



GPS services. For now, we would first like to confirm the information of the LightSquared system service deployment plan in Hawaii and Guam area to determine whether the impact to our monitoring stations would present.

We would be grateful if FCC could consider our concerns in the FCC's decision making process to avoid harmful interference into the GPS systems and our QZSS systems.

Sincerely,

Tadashi Noumi

Director, Spectrum Management Office

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