

July 29, 2011

The Honorable Julius Genachowski  
Chairman  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

RE: **FCC-IB – Docket No. 11-109 - LightSquared Technical Working Group Report as a condition in FCC Order and Authorization, DA 11-133 (released January 26, 2011)**

Dear Chairman Genachowski:

The National Marine Manufacturers Association (NMMA), the nation's leading recreational marine industry association, is pleased to provide these comments to the Federal Communications Commission (FCC) regarding the LightSquared Subsidiary LLC (LightSquared) final report of the Technical Working Group<sup>1</sup> and the application request of LightSquared for modification of its authority for Ancillary Terrestrial Component [FCC File No. SAT-MOD-20101118-00239].

Of the 231.5 million adults living in the United States in 2010, 32.4 percent, or 75 million people, participated in recreational boating in 2010. There are 16.67 million recreational boats in use nationwide. NMMA is understandably concerned about the impact on boaters' use of the GPS system in Personal Locator Devices, VHF-FM marine radios, the U.S. Coast Guard's Rescue 21 system, DSC-equipped radios, 406 EPIRBs and GPS navigation systems. Loss of accurate and uncompromised GPS signals will have a direct impact on boaters' safety and enjoyment of the waters. The FCC has a duty to ensure that any future use of the spectrum will not interfere with existing uses and most importantly will not cause citizens to be placed in harm's way.

We are especially concerned with the apparent lack of concern shown in the Technical Working Group report to the effect of the LightSquared proposal on existing devices. In addition, it is notable that the testing that was done by the Technical Working Group did not include recreational marine applications.

The FCC should withhold its final approval and rescind its preliminary provisional approval until the proposed uses of the GPS adjacent spectrum by LightSquared or others have been fully and carefully vetted. Put simply, boaters must have confidence that their navigation or emergency

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<sup>1</sup> The Technical Working Group was co-chaired by LightSquared and the United States Global Position System (GPS) Industry Council.

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locator equipment will function properly. The FCC has been able to work out similar disputes in the past and should take the time to find a solution that works for all users of the GPS spectrum.

Thus far, the mitigation measures that have been proposed by LightSquared (lower transmission power levels and new unproven electronic filters on GPS receivers) will leave the vast majority of existing GPS units vulnerable to interference and degraded performance. It is unreasonable and impractical to require existing users to retrofit their GPS units. This is especially true since many of those units are only used by boaters in extreme emergencies and it will be difficult for boaters to discover interference problems until it is too late.

As the nation's leading recreational marine industry association, NMMA represents nearly 1,300 boat builders, engine manufacturers, and marine accessory manufacturers. NMMA members collectively produce more than 80 percent of all recreational marine products made in the United States. The recreational marine industry is a major consumer goods and services industry that contributed \$30.4 billion in new retail sales and services to the U.S. economy in 2010 and generates nearly 220,000 jobs nationwide.

Thank you for the opportunity to provide these comments. Please contact me if you have any questions at [csquires@nmma.org](mailto:csquires@nmma.org) or 202-737-9766.

Sincerely,

A handwritten signature in blue ink that reads "Cindy L. Squires". The signature is fluid and cursive, with the first name "Cindy" being the most prominent.

Cindy L. Squires, Esq.  
Chief Counsel for Public Affairs and Director of Regulatory Affairs