

# Coalition of Geospatial Organizations

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June 15, 2011

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

**Re: *Ex Parte* Presentation re LightSquared Subsidiary, LLC,  
File No. SAT-MOD-20101118-00239**

Dear Ms. Dortch:

I am writing to you on behalf of The Coalition of Geospatial Organizations (COGO), a coalition of 15 national professional societies, trade associations, and membership organizations in the geospatial field, representing more than 35,000 individual producers and users of geospatial data and technology.

The stakeholder groups that make up COGO speak with one voice wherever possible on geospatial data and policy issues. COGO only takes public policy positions with a unanimous vote of its member organizations. In this regard, COGO seeks to express its urgent and critical concern regarding the issues under consideration by the Commission in the referenced proceeding.

The members of COGO's organizations rely very heavily on high-precision Global Positioning System (GPS) receiver equipment to carry out their missions. The precise data obtained through the use of advanced GPS receiver equipment has virtually revolutionized their ability to collect and process geospatial data in a manner not possible without access to uninterrupted GPS signals. As a consequence, these members have developed and continue to innovate applications that affect virtually every sector of our economy. COGO and its member organizations are therefore very concerned that the introduction of high-power, high-density terrestrial-only broadband transmitters in the spectrum adjacent to the Radionavigation Satellite Service operating in the 1559 – 1610 MHz frequency band will seriously interfere with reception of GPS signals operating in this band. Any level of possible interference will affect the ability to collect sufficiently robust GPS signals to achieve the critical task of geospatial data collection. Our concern is not simply with interference to existing applications, but the very possible impact this interference could have on our members' ability to develop future advanced applications.

COGO is aware that LightSquared has been required to submit a report on June 15, 2011 detailing the results of a Commission-mandated study of the potential for LightSquared terrestrial-only broadband transmitters to desensitize GPS receivers. COGO looks forward to reviewing the report and providing the Commission with its views on the results reported in the study. COGO supports the Administration's goal of increasing access to mobile broadband which also benefits our members. However, increasing broadband access at the expense of

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interfering with GPS signals portends a negative outcome for the Nation and is not a solution that advances the public interest. GPS is a proven national information utility that supports national security, homeland security, public safety and a broad range of commercial applications.

COGO respectfully requests that the Commission not provide any further approvals for LightSquared's planned deployment of high-density, high-power terrestrial-only broadband transmitters in the band adjacent to the spectrum where GPS operates until the issue of interference to GPS is fully understood and appropriate measures are proven to be workable to avoid such interference. These measures must ensure sustainment of the national GPS utility and proven positioning and navigation information, as well as continuing innovation that benefits the Nation and that delivers the operational performance on which our COGO organizations and their members depend.

Respectfully submitted,



Geney Terry, GISP, MGIS  
2011 COGO Chair

American Congress on Surveying and Mapping (ACSM)  
American Society for Photogrammetry and Remote Sensing (ASPRS)  
Association of American Geographers (AAG)  
Cartography and Geographic Information Society (CaGIS)  
Geographic Information Systems Certification Institute (GISCI)  
International Association of Assessing Officers (IAAO)  
Management Association for Private Photogrammetric Surveyors (MAPPS)  
National States Geographic Information Council (NSGIC)  
United States Geospatial Intelligence Foundation (USGIF)  
University Consortium for Geographic Information Science (UCGIS)  
Urban Regional Information Systems Association (URISA)

