



February 7, 2011

The Honorable Julius Genachowski  
Chairman  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

**Subject: LightSquared Application Request for Modification of Its Authority for Ancillary Terrestrial Component (ATC)  
(FCC File No. SAT-M OD-20101118-00239)**

Dear Mr. Chairman:

MAPPS, the Management Association for Private Photogrammetric Surveyors ([www.mapps.org](http://www.mapps.org)), is the only national association of firms in the surveying, spatial data and geographic information systems field in the United States. MAPPS member firms are engaged in surveying, photogrammetry, satellite and airborne remote sensing, aerial photography, hydrography, aerial and satellite image processing, Global Positioning System (GPS) and Geographic Information System (GIS) data collection and conversion services.

I am writing to express the concern of MAPPS member firms to the Commission's evaluation of the above-referenced application.

Data derived from applications of GPS positioning, navigation, tracking and geodetic networks across the United States could be corrupted or lost if harmful interference occurred as a result of strong signal mobile terrestrial communications adjacent to the GPS signals. These applications range from surveying and construction to urban asset management and maintenance of geographic information systems (GIS) crucial to major metropolitan areas nationwide. All of these have the potential to be adversely effected by the LightSquared proposal, if granted as filed, unless interference analysis is conducted and rigorous measures are implemented to mitigate interference to the reception of GPS signals.

In a recent letter to the Commission, the Administrator of the National Telecommunications and Information Administration (NTIA), stated that, in NTIA's view, this proposal "raises significant interference concern" and "would create a new interference environment" for GPS. The potential for harmful interference is a particular concern for surveying and mapping firms, and our clients, that are critically reliant on uninterrupted GPS signals.

The Commission's evaluation of this waiver application must focus on a full and open understanding of the technical, environmental, safety, and economic impact of any decision. In light of the importance of the nature and extent of possible adverse consequences, MAPPS respectfully suggests the LightSquared application should not receive expedited treatment. Instead, the commission should terminate review of this application and incorporate it within the current MSS Broadband NPRM/ROI ET Docket No. 10-142 in order to provide adequate opportunity for public comment and openly reviewed analyses.

Sincerely,

John Palatiello  
Executive Director

Cc: Commissioner Michael J. Copps  
Commissioner Robert M. McDowell  
Commissioner Mignon Clyburn  
Commissioner Meredith Attwell Baker

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