March 18, 2019

The Honorable Ajit Pai, Chairman
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: FCC # DA-16-443; Docket RM-11681

Dear Chairman Pai:

The National Society of Professional Surveyors (NSPS) is the national voice of land surveying professionals throughout the United States. Today, there are over 45,000 professional surveyors in the United States. Along with the profession's well-recognized and essential role related to the description and location of public and private land boundaries, every day our government and free enterprise system relies upon surveying and geospatial data for the management of natural resources, economic development, the management, adjudication, and prevention of future disruptions in the home mortgage system, the development and implementation of a smart energy grid, the deployment of universal domestic broadband service, the management of Federal real property assets, emergency preparedness and response, homeland security, the delivery of efficient health care and other services provided, financed, or regulated by the Federal Government, measuring, monitoring, verifying and validating the effects of climatic and environmental phenomena, and the maintenance, rehabilitation, and enhancement of public works, transportation, and other infrastructure of the United States.

Indeed, surveying and mapping is essential to a variety of communications systems and networks, with utilization of the Global Positioning System (GPS) being an important tool in the performance of such professional services.

I am writing to you to express our concern about the Ligado Networks proposals and the interference they would cause to GPS and GNSS data acquisition, processing, and use.

Unbiased testing has repeatedly confirmed that such implementation would surely undermine many of the uses of that data which have come to be anticipated, even essential, among the public and within the geospatial profession that provides services to it.
We take very seriously the role of our respective members in protecting the public’s interests from harm, and strongly urge the rejection of the Ligado Networks proposals which will undoubtedly cause such harm.

Sincerely,

[Signature]

Curtis W. Sumner, PLS
Executive Director

Cc: Representative Frank Pallone, Chair, House Energy and Commerce Committee
Representative Greg Walden, Ranking Member, House Energy and Commerce Committee
Senator Roger Wicker, Chair, Senate Commerce, Science & Transportation Committee
Senator Maria Cantwell, Ranking Member, Senate Commerce, Science & Transportation Committee
Representative Mike Quigley, Chair, House Appropriations Subcommittee on Financial Services and General Government
Representative Tom Graves, Ranking Member, House Appropriations Subcommittee on Financial Services and General Government
Senator John Kennedy, Chair, Senate Appropriations Subcommittee on Financial Services and General Government
Senator Chris Coons, Ranking Member, Senate Appropriations Subcommittee on Financial Services and General Government