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June 1, 2011

Julius Genachowski
Chairman
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Interference from High-Powered, Wide-Area Transmitters at Frequencies Close to Those Used by GPS, IB Docket No. 08-184

Dear Chairman Genachowski:

The Alliance for Telecommunications Industry Solutions (ATIS), on behalf of its Copper/Optical Access, Synchronization and Transport (COAST) Committee, would like to express its concern over the potential for interference from high-powered, wide-area transmitters operating at frequencies very close to those used by Global Positioning System (GPS), such as those proposed for use by LightSquared Subsidiary LLC (LightSquared).

By way of background, ATIS is a global standards development and technical planning organization that leads, develops and promotes worldwide technical and operations standards for information, entertainment and communications technologies. More than 200 companies actively participate in ATIS' committees and forums, which develop standards, specifications, best practices, and guidelines essential to communications networks' operation and continued evolution.

ATIS COAST develops and recommends standards and technical reports for home, access and transport network and synchronization technologies over copper and optical mediums. COAST is comprised of four subcommittees: COAST Network Access Interfaces (NAI), COAST Optical Access Networks (OAN), COAST Optical Hierarchical Interfaces (OHI), and COAST Synchronization (SYNC).

ATIS COAST notes that North American telecommunications networks are critically dependent on GPS. GPS-derived timing using stationary antennas allows precise synchronization of networks operated by different network providers and adherence to national telecom network synchronization standards. Such GPS-based synchronization allows for proper network operation, including wireless call handoffs and the realization of network-to-network and international

error performance objectives. In addition, GPS-based network synchronization is critically important for location-based services, and is required in many North American networks to meet FCC-mandated E9-1-1 emergency location services requirements.

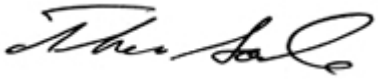
ATIS COAST is very concerned about the deployment of high-powered, wide-area transmitters using frequencies very close to those used by GPS. Additional studies on the impact to telecommunications timing receivers and antennas would be beneficial to ensure that the deployment of these high-powered transmitters do not interfere with telecommunications timing receivers and antennas. The significant risk of service disruptions, along with the cost and difficulty of resolving any such problems, justifies a very thorough and comprehensive evaluation.

ATIS COAST therefore urges caution in the deployment of high-powered, wide-area transmitters in frequencies very close to those used by GPS. ATIS appreciates the on-going efforts to ensure that the concerns over the potential interference to GPS are addressed expeditiously before such proposed services are deployed.

A copy of this letter is being filed electronically in the above-referenced docket.

If there are any questions pertaining to this matter, please do not hesitate to contact the undersigned.

Sincerely



Thomas Goode
ATIS General Counsel

cc: GPS Interference Working Group