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January 14, 2011

Mr. Nicholas Oros
Federal Communications Commission (FCC)
Office of Engineering and Technology
445 12th Street, S.W.
Washington, D.C. 20554

Re: FCC Proceeding Number 10-142: Notice of Proposed Rulemaking and Notice of Inquiry Fixed and Mobile Services in the Mobile Satellite Service Bands at 1525-1559 MHz and 1626.5-1660.5 MHz, 160-1626.5 MHz and 2483.5-2500MHz, and 2000-2020 MHz and 2180-2200 MHz

Dear Mr. Oros:

The Aircraft Owners and Pilots Association (AOPA) is the worlds largest aviation association, comprised of general aviation pilots and aircraft owners. The 405,000 members of AOPA utilize a wide range of aircraft types for both recreation and travel. AOPA learned about this specific rulemaking and notice of inquiry as a result of the November 19, 2010 Public Notice for application by LightSquared to modify its authority to establish a terrestrial based service in frequency spectrum currently approved for mobile-satellite services (MSS). Surprisingly the Federal Communication Commission (FCC) is contemplating an expanded authority to LightSquared, before completing the rulemaking process associated with proceeding number 10-142.

Until the FCC has adequately demonstrated to the aviation community that there will be no impact on Global Positioning System (GPS), AOPA opposes the proposed modification of the Commission's regulations.

Due to the extensive reliance on GPS by the general aviation community, any interference source is perceived as a safety threat. For more than 15 years general aviation has relied on GPS for improved safety and efficiency, and over that same time period general aviation safety has improved. Currently, more than 80 percent of all AOPA members surveyed indicate that they rely on GPS in various ways, such as navigation, electronic mapping, terrain avoidance, and traffic proximity awareness.

For more than 20 years AOPA has supported the Federal Aviation Administration's (FAA) goal to transition from a ground-based navigation system to a GPS based system. AOPA maintains a policy position that GPS and its associated augmentations should be adequate for all operations in America's airspace. As an example, general aviation pilots utilize GPS for precision instrument approaches at thousands of airports nationwide. The instrument approaches allow

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pilots to safely descend through clouds and transition to landing. In many cases, without the GPS signal the pilots cannot conduct the approaches and there may be times when they cannot safely fly to another location where a terrestrial approach is available, in lieu of GPS. A new transmission capability that interferes with the GPS signals would be extremely harmful to general aviation.

The use of GPS for safety-of-life applications is expected to increase beyond moving maps and instrument approaches, because the FAA has approved the expanded use of GPS for other applications as well, including a plan to replace RADAR with a GPS based aircraft tracking system that provides air traffic controllers with aircraft position, and allows controllers to direct aircraft safely through complex and busy airspace.

Based on the described use of GPS by the AOPA members above, we are deeply concerned that the FCC will not adequately address the potential interference issues that would emerge with a change in the use of the MSS spectrum. AOPA encourages FCC to carefully study the concept of using MSS for terrestrial use, and where necessary impose heavy restrictions on any operator of a terrestrial system until the aviation community has received and validated technical data that demonstrates that the MSS spectrum utilization does not affect safety-of-life applications with GPS.

If you have any questions pertaining to our request, please contact me or Heidi Williams at 301-695-2227 or email Heidi.williams@aopa.org.

Sincerely,



Melissa Rudinger
Senior Vice President
Government Affairs