

June 22, 2021

The Honorable James M. Inhofe
United States Senate
Washington, D.C. 20510

The Honorable Tammy Duckworth
United States Senate
Washington, D.C. 20510

The Honorable Mike Rounds
United States Senate
Washington, D.C. 20510

Dear Senators:

The undersigned companies and organizations strongly endorse the **Recognizing and Ensuring Taxpayer Access to Infrastructure Necessary for GPS and Satellite Communications Act** or the **“RETAIN GPS and Satellite Communications Act”** introduced today. This legislation would ensure that the costs incurred by the public sector, businesses and consumers as a result of the FCC’s decision to permit Ligado Networks LLC to use spectrum in a way that would cause interference to GPS and satellite communications would be covered by Ligado—the licensee benefiting from the decision.

The FCC’s Ligado Order already recognizes the potential for interference to GPS receivers and requires that, *“Ligado shall expeditiously repair or replace as needed any U.S. Government GPS devices that experience or are likely to experience harmful interference from Ligado’s operations.”* But the Order failed to go far enough in three key ways. *First*, it did not provide an adequate description of the potential costs to federal agencies and thus the American taxpayer. Federal agencies are responsible for ensuring reliable GPS and satellite communications necessary for all manner of safety of life operations. *Second*, while recognizing the potential costs associated with interference to Federal agency owned devices, the FCC order inexplicably fails to require that Ligado also bear the costs of interference to other government and private owners of devices and applications that may be disrupted by Ligado’s proposed operations. *Third*, the Order improperly applies interference limits that are fundamentally insufficient to protect critical satellite communications and navigation signals from unknown millions of Ligado devices operating over wide geographic areas.

Ninety-nine percent of GPS receivers are used in critical applications by non-Federal government users, businesses and consumers. In addition, the Order similarly threatens the satellite communications networks that can enable technologies used to complement and support GPS. The reliability of GPS and satellite communications is necessary for safety of life operations, national security and economic activity; critical communications capabilities; commercial and civil aviation; first responders, 9-1-1 and other public safety operators; military readiness and communications; weather forecasting; the movement of goods on our highways; the marking maritime harbors and channels; farmers planting and harvesting crops; operation of construction and mining equipment—and the list goes on and on.

The RETAIN GPS and Satellite Communications Act acknowledges the harm to GPS and satellite communications end users caused by the Ligado order and ensures the burden of cost

sits squarely where it belongs—on Ligado, rather than our first responders, farmers, pilots, boat owners, surveyors or construction companies. We commend you for recognizing the expense and burden the Ligado order places on federal agencies, American taxpayers, businesses and consumers, and for providing clear and immediate relief to critical stakeholders with this legislation. Thank you for your leadership on this important issue.

Sincerely,

Aerospace Industries Association (AIA)	Boat Owners Association of The United States,
Agriculture Retailers Association	BoatU.S.
Air Line Pilots Association, Int'l (ALPA)	Cargo Airline Association (CAA)
Airborne Public Safety Association (APSA)	Center for Sportfishing Policy
Aircraft Electronics Association	CNH Industrial
Aircraft Owners and Pilots Association (AOPA)	Coastal Conservation Association
Airlines for America (A4A)	CoBank
Airo Drone, LLC	CompTIA Space Enterprise Council
Alaska Airlines	Crown Consulting Inc.
Allegiant Air	Cubic Corporation
Allied Pilots Association	Delta Air Lines
American Airlines	Eastern Region Helicopter Council (ERHC)
American Association of Airport Executives	Equipment Dealers Association
American Concrete Pavement Association	Esri
American Concrete Pipe Association	FedEx Corporation
American Council of Engineering Companies	Frontier Airlines
American Farm Bureau Federation	General Aviation Manufacturers Association (GAMA)
American Rental Association	Hawaii Helicopter Association
American Road & Transportation Builders Association (ARTBA)	Helicopter Association International (HAI)
American Society of Civil Engineers (ASCE)	Hellen Systems
American Soybean Association	International Air Transport Association (IATA)
American Sportfishing Association	Iowa-Nebraska Equipment Dealers Association
American Trucking Associations	Iridium
Associated Equipment Distributors	L3Harris
Associated General Contractors of America (AGC)	Lockheed Martin
Association of Equipment Manufacturers (AEM)	Marine Retailers Association of the Americas
Association of Marina Industries	National Agricultural Aviation Association
Atlas Air Worldwide	National Air Carrier Association
Aviation Spectrum Resources Inc. (ASRI)	National Air Transportation Association (NATA)
Blue Origin	National Asphalt Pavement Association
	National Business Aviation Association (NBAA)

National Cotton Council
National Defense Industrial Association
National Marine Manufacturers Association
National Society of Professional Surveyors
(NSPS)
National Stone, Sand and Gravel Association
National Utility Contractors Association
NetJets Association of Shared Aircraft Pilots
(NJASAP)
NEXA Capital Partners LLC
Oklahoma Society of Land Surveyors
Polar Cargo
Portland Cement Association
Regional Airline Association (RAA)
Resilient Navigation and Timing Foundation
(RNTFnd)
Skytrac
Southwest Airlines
Southwest Airlines Pilots Association
Spirit Airlines
Subsurface Utility Engineering Association
Sun Country Airlines
The Vertical Flight Society
Trimble
U.S. Contract Tower Association
U.S. Geospatial Executives Organization
USA Rice