



RNT Foundation
4558 Shetland Green Rd
Alexandria, VA 22312

March 20, 2018

The Honorable Ajit Pai
The Honorable Mignon Clyburn
The Honorable Michael O’Rielly
The Honorable Brendan Carr
The Honorable Jessica Rosenworcel

Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: *Ex parte* presentation in IB Docket Nos. 11-109 and 12-340

Dear Chairman Pai and Commissioners Clyburn, O’Rielly, Carr and Rosenworcel:

The Resilient Navigation and Timing Foundation (www.RNTFnd.org) is a nonprofit, public benefit corporation that helps protect critical infrastructure by promoting resilient navigation and timing worldwide. We share your goal of protecting the nation’s critical positioning, navigation, and timing (PNT) services delivered by GPS, while also maximizing the efficient use of spectrum. This requires protecting, toughening, and augmenting our nation’s PNT services.

In your deliberations in the above referenced proceedings, please carefully consider the attached information that is publicly available at the US Patent and Trademark Office (USPTO). This material was brought to light in a recently filed [lawsuit](#) in which Harbinger Capital Partners claims that Apollo Global Management Directors (and Apollo-appointed directors of SkyTerra Communications, Inc.) knew, but failed to disclose, that the planned terrestrial network would interfere with existing GPS devices.

The attached information shows that Mobile Satellite Ventures, a predecessor company of Ligado Networks, conducted tests in 2001 and found that their proposed terrestrial transmissions on frequencies adjacent to those used by GPS would interfere with many GPS receivers.

It is our understanding that these tests were never disclosed to the FCC by Mobile Satellite Ventures or its successor companies. Given the FCC rules requiring truthful and accurate statements, including a prohibition on the omission of material information relevant to FCC decision making, this information is being provided for the Commission's consideration as it addresses the issues raised in these proceedings.

A handwritten signature in blue ink, appearing to read "Dana A. Goward". The signature is fluid and cursive, with a large loop at the end.

Dana A. Goward
President

Attached: Attorney Docket No. 9301-74REI, "Information Disclosure Statement" and accompanying presentation materials.

cc: Rachael Bender
Louis Peraertz
Erin McGrath
Will Adams
Umair Javed