

April 22, 2025

The Honorable Donald J. Trump
President of the United States
The White House
1600 Pennsylvania Avenue NW
Washington, D.C. 20500

Dear President Trump:

The undersigned represent a broad cross-section of the federal and commercial user bases of Global Positioning System (“GPS”), satellite communications, and weather forecasting services that have raised ongoing and unresolved concerns about the harmful interference risk that would be created by operation of terrestrial mobile service in portions of the L-band permitted as a result of the Federal Communications Commission’s (“FCC’s”) April 2020 *Ligado Order*.¹ Now, five years after the *Order*’s adoption:

- Eight petitions for reconsideration remain pending before the FCC;²
- An independent technical analysis completed by the National Academies of Sciences, Engineering, and Medicine (“NAS”) in 2022 as mandated by Congress in 2021³ has shown that the *Order* is inadequate to protect incumbent services from Ligado’s proposed terrestrial operations;⁴
- Ligado has filed for bankruptcy,⁵ and the nature of Ligado’s operations in the United States is once again shifting;⁶ and
- Ligado has sued the U.S. government for \$39 billion.⁷

¹ *Ligado Amendment to License Modification Applications*, IBFS File Nos. SES-MOD-20151231-00981, SAT-MOD-20151231-00090, and SAT-MOD-20151231-00091, Order and Authorization, 35 FCC Rcd 3772 (2020) (“*Ligado Order*” or “*Order*”).

² More than 20 parties signed across eight separate petitions for reconsideration of the *Ligado Order*, and all of these petitions remain pending before the FCC. See Petitions for Reconsideration of the National Telecommunications and Information Administration (“NTIA”); the Air Line Pilots Association, International; the American Road & Transportation Builders Association, the American Farm Bureau Federation, and the Association of Equipment Manufacturers; the Joint Aviation Petitioners; Iridium Communications Inc., Flyht Aerospace Solutions Ltd., Aireon LLC, and Skytrac Systems Ltd.; Lockheed Martin Corporation; Trimble Inc.; and the Resilient Navigation and Timing Foundation, IB Docket Nos. 11-109 & 12-340 (all filed on or about May 22, 2020). The 10 “Joint Aviation Petitioners” consist of the Aerospace Industries Association, the Aircraft Owners and Pilots Association, Airlines for America, Aviation Spectrum Resources, Inc., the Cargo Airline Association, the General Aviation Manufacturers Association, the Helicopter Association International, the International Air Transport Association, the National Air Transportation Association, and the National Business Aviation Association.

³ See William M. (Mac) Thornberry National Defense Authorization Act (“NDAA”) for Fiscal Year 2021, Pub. L. 116-283, 134 Stat. 4074 § 1663.

⁴ National Academies of Sciences, Engineering, and Medicine, *Analysis of Potential Interference Issues Related to FCC Order 20-48* (2022), <https://doi.org/10.17226/26611> (“NAS Report”).

⁵ In Re: Ligado Networks LLC, Case No. 1:25-BK-10006, U.S. Bankruptcy Court, Dist. of Del (Jan. 5, 2025).

⁶ Press Release, Ligado Networks, *Ligado Networks Announces Comprehensive Restructuring Transaction* (Jan. 6, 2025), <https://ligado.com/press/ligado-networks-announces-comprehensive-restructuring-transaction/>.

⁷ Complaint, *Ligado Networks LLC v. United States*, No. 23-1797-L (Fed. Cl. Oct. 12, 2023).

Given the ongoing concerns raised since the *Ligado Order* was adopted, we urge you to work together with the FCC to grant the petitions for reconsideration and set aside the *Order*.

For over two decades, several federal agencies have spent countless staff hours and resources reviewing, debating, and litigating Ligado and its predecessors' failed attempts to deploy a terrestrial network that also protects critical commercial and government functions. Despite all of that effort, virtually nothing has been invested in a terrestrial network, and not one consumer or entity has been connected. The expertise and resources of the FCC, National Telecommunications and Information Administration ("NTIA"), and other agencies would be better served focusing on enhancing the reach, reliability, and security of America's networks and satellite services offered and/or used by the undersigned, promoting growth, and reducing regulatory barriers to investment, rather than extending uncertainty for the many industries that rely on the critical communication and other radio services that operate in the L-band. The quickest and best way for all parties involved to move on is for the FCC to grant the pending petitions, which would put the issue to rest.

As with prior iterations of Ligado's and its predecessor's terrestrial network plans, the *Ligado Order* threatens the critical GPS, satellite communications, and weather forecasting services relied on by millions of users every day. For this reason, the *Order* has faced unified and unprecedented opposition from the federal government, including 14 federal agencies and departments.⁸ Additionally, America's farmers and pilots, airlines and weather forecasters, boatmen and defense industries have operated with a cloud of uncertainty about the reliability of their critical communications systems. To resolve that uncertainty and the Ligado quagmire, Congress mandated the aforementioned NAS study. Congress, and the study, have spoken, and the *Ligado Order* should be voided.⁹

This extraordinary alliance of Americans from all over the country working across our economy ask that you finally resolve this issue by working to ensure the FCC grants the pending petitions for reconsideration. That will allow us once again to rely on our connectivity and other satellite-based services to continue to benefit the American people free from the harmful interference that Ligado's terrestrial operations would cause.

⁸ See Memorandum from Thu Luu, Executive Agent for GPS, Department of the Air Force, to Interdepartment Radio Advisory Committee Chairman (Feb. 14, 2020).

⁹ The FCC should also not proceed to adopt rules in companion rulemakings that would create a material risk of harmful interference to weather forecasting and hydrology services resulting from proposed Ligado deployments in the 1675-1680 MHz spectrum band, particularly considering the complete analysis presented in the "Spectrum Pipeline Reallocation 1675-1680 MHz Engineering Study (SPRES) Program Report" and the "SPRES Follow-On Report (SPRES-FO)." See *Allocation and Service Rules for the 1675-1680 MHz Band*, Notice of Proposed Rulemaking, 34 FCC Rcd 3352 (2019); U.S. Department of Commerce, National Oceanic and Atmospheric Administration (NOAA), National Environmental Satellite Data and Information Service, *Spectrum Pipeline Reallocation 1675-1680 MHz Engineering Study (SPRES) Program Report*, Silver Spring, MD: NESDIS, October 2020 (public release Aug. 2022); U.S. Department of Commerce, NOAA, NESDIS, and NTIA, *Spectrum Pipeline Reallocation Engineering Study Follow-On (SPRES-FO) Final Report*, Silver Spring, MD: NESDIS, Aug 2024 (public release Nov. 2024).

Sincerely,

| | |
|--|---|
| AccuWeather | Kansas Agricultural Aviation Association |
| Agricultural Retailers Association | Louisiana Agricultural Aviation Association |
| Airborne Public Safety Association (APSA) | Marine Retailers Association of the Americas |
| Aircraft Electronics Association | Michigan Agricultural Aviation Association |
| Aircraft Owners and Pilots Association (AOPA) | Microcom Environmental |
| Aireon | Minnesota Agricultural Aircraft Association |
| Air Line Pilots Association, International | Mississippi Agricultural Aviation Association |
| Airlines for America | Missouri Agricultural Aviation Association |
| ALERT Users Group | Narayan Strategy |
| Allied Pilots Association | National Agricultural Aviation Association |
| American Farm Bureau Federation | National Air Carrier Association |
| American Geophysical Union (AGU) | National Air Transportation Association (NATA) |
| American Meteorological Society | National Business Aviation Association |
| American Road & Transportation Builders Association | National Cotton Council |
| American Sportfishing Association | National Society of Professional Surveyors (NSPS) |
| American Weather and Climate Industry Association | National Weather Association |
| Arizona Agricultural Aviation Association | Nebraska Aviation Trades Association |
| Arkansas Agricultural Aviation Association | NetJets Association of Shared Aircraft Pilots |
| Associated Equipment Distributors | New Mexico Agricultural Aviation Association |
| Association of Aerial Applicators Washington | North Carolina Agricultural Aviation Association |
| Association of Equipment Manufacturers | North Dakota Agricultural Aviation Association |
| Association of Marina Industries | Northeast Agricultural Aviation Association |
| Association of Montana Aerial Applicators | Ohio Agricultural Aviation Association |
| Atlas Air | Oklahoma Agricultural Aviation Association |
| Aviation Spectrum Resources, Inc. (ASRI) | Oregon Agricultural Aviation Association |
| Baron Weather | Pacific Northwest Aerial Applicators Alliance |
| Boat Owners Association of The United States, BoatU.S. | PlanetIQ |
| California Agricultural Aircraft Association | Polar Air Cargo |
| Capitol Meteorologies | Recreational Boaters of California (RBOC) |
| Cargo Airline Association | Regional Airline Association |
| Coalition of Airline Pilots Associations (CAPA) | Resilient Navigation & Timing Foundation (RNTF) |
| CoBank | Seafarers International Union |
| Colorado Agricultural Aviation Association | Southeast Aero Cultural Fair |
| Furchtgott International | South Dakota Aviation Association |
| Florida Agricultural Aviation Association | Space Science and Engineering Center at the University of Wisconsin-Madison |
| Frontier Airlines | Subsurface Utility Engineering Association (SUEA) |
| Garmin | Tennessee Aerial Applicators Association |
| General Aviation Manufacturers Association | Texas Agricultural Aviation Association |
| Georgia Agricultural Aviation Association | The Airo Group |
| Geospatial Professional Network (formerly URISA) | The Semaphore Group |
| Idaho Agricultural Aviation Association | Trimble Inc. |
| Illinois Agricultural Aviation Association | University Corporation for Atmospheric Research (UCAR) |
| Indiana Agricultural Aviation Association | U.S. Geospatial Executives Organization (U.S. GEO) |
| International Air Transport Association | USA Rice |
| Iowa Agricultural Aviation Association | Vertical Aviation International (VAI) |
| Iridium Communications Inc. | Westwind Helicopters, Inc |
| | Wisconsin Agricultural Aviation Association |