

April 22, 2025

The Honorable John Thune  
Majority Leader  
U.S. Senate  
Washington, D.C. 20510

The Honorable Charles Schumer  
Democratic Leader  
U.S. Senate  
Washington, D.C. 20510

The Honorable Mike Johnson  
Speaker of the House  
U.S. House of Representatives  
Washington, D.C. 20515

The Honorable Hakeem Jeffries  
Democratic Leader  
U.S. House of Representatives  
Washington, D.C. 20515

The Honorable Roger Wicker  
Chairman  
Senate Committee on Armed Services  
Washington, D.C. 20510

The Honorable Jack Reed  
Ranking Member  
Senate Committee on Armed Services  
Washington, D.C. 20510

The Honorable Mike Rogers  
Chairman  
House Committee on Armed Services  
Washington, D.C. 20515

The Honorable Adam Smith  
Ranking Member  
House Committee on Armed Services  
Washington, D.C. 20515

The Honorable Ted Cruz  
Chair  
Senate Committee on Commerce, Science, and  
Transportation  
Washington, D.C. 20510

The Honorable Maria Cantwell  
Ranking Member  
Senate Committee on Commerce, Science, and  
Transportation  
Washington, D.C. 20510

The Honorable Brett Guthrie  
Chair  
House Committee on Energy and Commerce  
Washington, D.C. 20515

The Honorable Frank Pallone, Jr.  
Ranking Member  
House Committee on Energy and Commerce  
Washington, D.C. 20515

Dear Senators and Members of Congress:

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*.<sup>1</sup> Now, five years after the *Order*’s adoption:

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<sup>1</sup> *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 Red 3772 (2020) (“Ligado Order” or “Order”).*

- Eight petitions for reconsideration remain pending before the FCC;<sup>2</sup>
- An independent technical analysis completed by the National Academies of Sciences, Engineering, and Medicine (“NAS”) in 2022 as mandated by Congress in 2021<sup>3</sup> has shown that the *Order* is inadequate to protect incumbent services from Ligado’s proposed terrestrial operations;<sup>4</sup>
- Ligado has filed for bankruptcy,<sup>5</sup> and the nature of Ligado’s operations in the United States is once again shifting;<sup>6</sup> and
- Ligado has sued the U.S. government for \$39 billion.<sup>7</sup>

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

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<sup>2</sup> 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.

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

<sup>4</sup> 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”).

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

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

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

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.<sup>8</sup> 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.<sup>9</sup>

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.

Sincerely,

AccuWeather  
Agricultural Retailers Association  
Airborne Public Safety Association (APSA)  
Aircraft Electronics Association  
Aircraft Owners and Pilots Association (AOPA)  
Aireon  
Air Line Pilots Association, International  
Airlines for America  
ALERT Users Group  
Allied Pilots Association  
American Farm Bureau Federation  
American Geophysical Union (AGU)  
American Meteorological Society

American Road & Transportation Builders Association  
American Sportfishing Association  
American Weather and Climate Industry Association  
Arizona Agricultural Aviation Association  
Arkansas Agricultural Aviation Association  
Associated Equipment Distributors  
Association of Aerial Applicators Washington  
Association of Equipment Manufacturers  
Association of Marina Industries  
Association of Montana Aerial Applicators  
Atlas Air  
Aviation Spectrum Resources, Inc. (ASRI)  
Baron Weather

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

<sup>9</sup> 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).

Boat Owners Association of The United States, BoatU.S.	National Society of Professional Surveyors (NSPS)
California Agricultural Aircraft Association	National Weather Association
Capitol Meteorologies	Nebraska Aviation Trades Association
Cargo Airline Association	NetJets Association of Shared Aircraft Pilots
Coalition of Airline Pilots Associations (CAPA)	New Mexico Agricultural Aviation Association
CoBank	North Carolina Agricultural Aviation Association
Colorado Agricultural Aviation Association	North Dakota Agricultural Aviation Association
Furchtgott International	Northeast Agricultural Aviation Association
Florida Agricultural Aviation Association	Ohio Agricultural Aviation Association
Frontier Airlines	Oklahoma Agricultural Aviation Association
Garmin	Oregon Agricultural Aviation Association
General Aviation Manufacturers Association	Pacific Northwest Aerial Applicators Alliance
Georgia Agricultural Aviation Association	PlanetIQ
Geospatial Professional Network (formerly URISA)	Polar Air Cargo
Idaho Agricultural Aviation Association	Recreational Boaters of California (RBOC)
Illinois Agricultural Aviation Association	Regional Airline Association
Indiana Agricultural Aviation Association	Resilient Navigation & Timing Foundation (RNTF)
International Air Transport Association	Seafarers International Union
Iowa Agricultural Aviation Association	Southeast Aero Cultural Fair
Iridium Communications Inc.	South Dakota Aviation Association
Kansas Agricultural Aviation Association	Space Science and Engineering Center at the University of Wisconsin-Madison
Louisiana Agricultural Aviation Association	Subsurface Utility Engineering Association (SUEA)
Marine Retailers Association of the Americas	Tennessee Aerial Applicators Association
Michigan Agricultural Aviation Association	Texas Agricultural Aviation Association
Microcom Environmental	The Airo Group
Minnesota Agricultural Aircraft Association	The Semaphore Group
Mississippi Agricultural Aviation Association	Trimble Inc.
Missouri Agricultural Aviation Association	University Corporation for Atmospheric Research (UCAR)
Narayan Strategy	U.S. Geospatial Executives Organization (U.S. GEO)
National Agricultural Aviation Association	USA Rice
National Air Carrier Association	Vertical Aviation International (VAI)
National Air Transportation Association (NATA)	Westwind Helicopters, Inc
National Business Aviation Association	Wisconsin Agricultural Aviation Association
National Cotton Council	