

The Idaho Geospatial Council (IGC), which consists of 190 Geographic Information System (GIS) professionals from all corners of Idaho and includes members from federal, state, local, and tribal governments, public utilities, and private industry, provides this filing to express our serious concerns about the interference of Ligado Network's proposed broadband service (Proceeding 11-109) with existing Global Positioning Systems (GPS) and the many systems, businesses and people that rely on GPS.

The IGC and the many geographic information systems users across the state of Idaho rely upon global navigation satellite systems, including GPS, to accomplish numerous critical activities including emergency response, precision agriculture, infrastructure management, navigation, aviation safety, and applied science research. These applications impact the lives and livelihoods of nearly all Idahoans and represent a significant economic loss, and possibly loss of lives, if negatively affected. A specific example of this affect relates to Idaho Transportation Department where GPS interference can impact construction and maintenance efforts. GPS capabilities have been installed by virtually all contractors for precise machine control and these technologies significantly increase the speed of road work projects. Ligado Networks' proposed ATC service poses a substantial risk of harmful interference to the GPS data that underlies these many geospatial applications.

The IGC recognizes the value of mobile broadband technologies and its potential benefits to the rural communities of Idaho. However, jeopardizing critical applications that rely on GPS data is seen as an unnecessary trade off. Therefore, we urge the Commission to deny Ligado Networks' pending license modification application as proposed until Ligado Networks demonstrates it has addressed all GPS interference concerns.