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Via ICFS

July 20, 2026

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
45 L Street, NE
Washington, D.C. 20054

**Re: Notice of *Ex Parte* Presentation,
ICFS File No. SAT-MOD-20251206-00374**

Dear Ms. Dortch:

On July 16, 2026, Jennifer Manner of AST & Science, LLC (“AST”), and the undersigned on behalf of Ligado Networks Subsidiary LLC, Debtor-in-Possession (“Ligado”), met in person with William Holloway and Lilly Freemyer from Commissioner Olivia Trusty’s office and Edyael Casaperalta and Nia Grundy from Commissioner Anna Gomez’s office. At the meeting, Ligado and AST discussed the points set forth in the attachment. We explained how the L-band spectrum can be used to deliver space-based broadband services to mobile devices as soon as next year, and that Ligado’s application and arrangements are consistent with long-standing Commission rules and precedent.

Please direct any questions to the undersigned.

Respectfully submitted,

/s/ Gerard J. Waldron
Gerard J. Waldron
Counsel to Ligado Networks

cc: Edyael Casperalta
William Holloway
Lilly Freemyer
Nia Grundy

Attachment

SkyTerra Next Modification Application

- The pending license modification application would enable Ligado to operate SkyTerra Next, an L-band payload that will enable broadband direct-to-device (D2D) connectivity deployed aboard satellites in AST SpaceMobile's non-geostationary orbit (NGSO) constellation. This system will be used to provide additional capacity and coverage to AST SpaceMobile's mobile broadband D2D service in the United States and across North America.
- In response to the Public Notice for the application, there was support for the application including from the Mobile Satellite Services Association and Inmarsat, the party with whom Ligado's L-band MSS spectrum is coordinated.
- Technical issues. We have filed in the docket detailed a complete technical analysis and also answered questions that have been raised concerning the potential for harmful interference to GPS. We submitted a technical study by RKF Engineering as part of the Consolidated Opposition and Response to Comments which demonstrates that SkyTerra Next will not create any new risks of harmful interference. The study shows that GPS devices will enjoy a huge margin of protection (more than 19 dB) when operating in their assigned bands under conservative assumptions. In addition, Ligado filed a letter in June providing additional technical details requested by several parties including GPSIA.
- Legal issues. Iridium's legal claims lack any merit.
 - Iridium's bid to create a processing round has no grounds since Ligado is upgrading its technology, consistent with long-standing Commission precedent. Moreover, the Commission held authoritatively in the April 2026 Order that the L-band spectrum is exclusive and cannot be shared with a new entrant.
 - Further, Ligado, consistent with Commission precedent, will control its spectrum and SkyTerra Next. That control is embedded in the agreements between Ligado and AST SpaceMobile.
 - Finally, despite suggestions to the contrary, SkyTerra Next is an MSS-only system with no bearing on Ligado's ancillary terrestrial component (ATC) authority. Ligado retains the right to deploy its spectrum for ATC if that someday becomes possible.
- Therefore, based on the record and the strong public interest in granting the modification application to enable use of this spectrum in the United States and across North America, the FCC should move quickly to grant this application.