Trimble Navigation Limited
935 Stewart Drive
PO Box 3642
Sunnyvale, CA 94088-3642

June 16, 2008

U.S. Department of Commerce
Office of Space Commercialization
6818 Herbert C. Hoover Building
14th Street & Pennsylvania Avenue, N.W.
Washington, D.C. 20230
Attention: Mr. Jason Kim

Re: Docket No.: 080506632-8633-01
Subj: Codeless and Semi-Codeless Access to the Global Positioning System

Dear ~~Mr. Kim~~, Jason,

Trimble Navigation Limited wishes to express our support of the target date of December 31, 2020, proposed by the National Executive Committee for transitioning the installed user base of codeless and semi-codeless GPS equipment to next-generation capabilities utilizing the modernized civil GPS signals. The National Executive Committee wisely recognizes that a fixed target date for transition facilitates business decisions and stable planning for the user equipment industry and our customers. Most importantly, from our perspective, the National Executive Committee linked this proposed target date with the launch schedule for the GPS program to provide sufficient on-orbit L2C (and L5) signal capability to ensure a smooth transition.

Dual-frequency GPS receivers were first introduced into commercial survey markets in the early 1980's to achieve precision accuracy at the one to two centimeter level. Having determined that these commercial GPS products have high value as productivity enhancers, over two decades, users have expanded their economic models for buying GPS-enabled products, systems, and networks based on their confidence in predicting that this investment will fund their economic growth. For example, in agricultural applications, some of the performance metrics in this economic model include: cost savings per year in fuel, labor and repairs; increased income; return on investment; speed of payback (typically, in months) and the repeatability of results In construction applications, some of the performance metrics include: the elimination of rework; accomplishing the work with fewer passes; determining the right tolerances allowing for consistent concrete placement. Each quarter inch of concrete costs $1 million, so being off even a quarter-inch on two million square feet of concrete is significant additional cost.

This economic utility model is based on a return on investment in deployment of equipment, systems and networks of at least a decade which is equivalent to the decade

long process for upgrading the GPS satellites. In fact, many users are obtaining additional years of utility by redeploying their older dual-frequency GPS receivers as base stations in network applications. Having introduced GPS equipment with L2C capability into commercial GPS markets in 2003, we believe that the proposed target transition date of 2020 when linked to the GPS launch schedule for on-orbit modernized civilian GPS signal capability will afford our customers sufficient time to upgrade their systems and networks consistent with their product investment models.

We would like to express our deep appreciation to the National Executive Committee and to the members and Co-Chairs of the National Positioning, Navigation, and Timing Engineering Forum (NPEF) for the careful, deliberative study effort to facilitate the transition of the installed user base from semi-codeless techniques to modernized civilian GPS signals. We are grateful to the Office of Space Commercialization for the opportunity to provide comments on transition on behalf of our customers.

In 2003, customers of systems and networks using semi-codeless techniques expressed strong demand for equipment having the emerging L2C capability in advance of the launch of the first GPS satellite with L2C (Fall 2005). We believe that this customer willingness to invest in GPS products in advance of on-orbit capability represents a strong vote of confidence in stable U.S. policy and U.S. Government management of the GPS system.

Sincerely,

Ann Ciganer
Vice President
Strategic Policy

Bruce Peetz
Vice President
Advanced Technology