

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
International Bureau Seeks Comment on)	IB Docket No. 16-185
Recommendations Approved by World)	
Radiocommunication Conference)	WAC/o66
Advisory Committee)	

COMMENTS OF HEWLETT PACKARD ENTERPRISE

Hewlett Packard Enterprise (“HPE”) is one of the world’s leading manufacturers of wireless networking equipment. Access to adequate spectrum, governed by engineering-driven rules that promote sharing, is critical to our ability to serve large and small enterprises, entertainment venues, schools and universities, and government agencies. Our experience across frequency bands and in many different countries has given us insight into the way that regulators can adopt and promote technical rules that promote investment, robust wireless service, and protect incumbent operations.

Based on this experience, HPE supports “View A” of the World Radiocommunications Conference Advisory Committee on Agenda Item 1.16 (Document WAC/o66). This document reiterates the FCC’s existing rules for the 5150-5250 MHz band. These rules robustly protect the incumbent satellite operations, while permitting RLAN operations in this important band.

Globalstar opposes View A based on a paper that it presented in the WRC preparatory process. But a review of this paper shows it to be unreliable because it:

- (1) Reveals that Globalstar is not experiencing harmful interference;
- (2) Fails to demonstrate that unlicensed operations are the cause of its claimed measurements, and

(3) Fails to demonstrate that noise levels will ever rise to a level that would cause harmful interference.¹

Furthermore, the analysis performed by Roberson and Associates, LLC does not substantiate Globalstar's measurements. Roberson's analysis consists of a simple mathematical approximation of unlicensed emissions assuming a limited range of antenna types and radiation patterns. It does not include a reliable analysis of the number of access points operating in U-NII-I, how many of them operate outside, their power levels, or their intensity of use, all of which are critical factors to accurately modeling potential interference.

The Commission undertook a formal rulemaking, produced a full record, considered technical submissions from RLAN companies and Globalstar—and adopted careful rules. It should support those rules in the WRC Executive Branch reconciliation process, as it has consistently done with other FCC rules.

Respectfully submitted,

s/ Chuck Lukaszewski

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¹ For a fuller discussion of each of these points, *see* Reply Comments of Hewlett Packard Enterprise, RM-11808 (filed July 23, 2018).