

July 6, 2018

Via Electronic Filing

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: *Globalstar, Inc. Petition for Notice of Inquiry Regarding the Operation of Outdoor U-NII-1 Devices in the 5 GHz Band – RM-11808*

Dear Ms. Dortch:

sci_Zone, Inc. (“*sci_Zone*”) hereby supports *Globalstar, Inc.*’s (“*Globalstar’s*”) above-captioned Petition for Notice of Inquiry. We are asking the FCC should expeditiously adopt a Notice of Inquiry on aggregate interference issues in the 5.1 GHz band.

We understand from *Globalstar’s* petition that its licensed mobile satellite service (“MSS”) operations and outdoor Unlicensed National Information Infrastructure (“U-NII”) devices cannot successfully share the 5.1 GHz band. *sci_Zone* has noticed and *Globalstar* has measured a sharp rise in the noise level in the 5.1 GHz band, where it is licensed for “feeder uplink” transmissions from its gateway earth stations to its satellites.

The evidence in *Globalstar’s* Petition shows that this noise rise is caused by outdoor, higher-power operation of U-NII-1 Wi-Fi access points and other devices, permitted by the FCC in 2014. The noise level rise at 5.1 GHz in turn degrades *Globalstar’s* MSS provided to customers in the 2.4 GHz band. **This is impacting *Globalstar* based equipment we sell and service.** *Globalstar’s* licensed MSS is protected against harmful interference from unlicensed operations.

The radio systems developed by *sci_Zone* utilizing the *Globalstar* network can be used on a range of platforms including pipelines, storage tanks, automobiles, and small satellites including micro-satellites and cubesats. Our radio systems provide critical command and control plus data collection services for all these platforms which requires a clear signal unencumbered by interference. A loss of contact with our radios and the platforms hosting them can be catastrophic.

In its 2014 order, the FCC said that it would take “corrective action” if *Globalstar* and its customers experience harmful interference from outdoor U-NII-1 operations. Our *Globalstar* network based equipment is experiencing harmful interference.

sci_Zone is asking the FCC should begin this action now by issuing a Notice of Inquiry, rather than wait until *Globalstar* and its customers suffer future service disruptions.

Respectfully submitted,



Andrew Santangelo
Chief Technology Officer

Holland, Michigan — Rio Rancho, New Mexico