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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:

Space & Satellite Professionals International (SSPI) is an industry organization with over 3,000 members in more than 40 nations. SSPI aims to promote space and satellite as the invisible but indispensable infrastructure of the modern world. As such, SSPI is very concerned about harmful interference into licensed satellite services and the potential impact on the satellite industry if this interference is allowed to continue and expand.

SSPI strongly supports Globalstar, Inc.'s above-captioned Petition for Notice of Inquiry ("Globalstar's Petition"). The FCC should expeditiously issue a Notice of Inquiry on aggregate interference issues in the 5.1 GHz band. Based on our review of Globalstar's Petition, our understanding is that Globalstar's licensed mobile satellite service ("MSS") operations and outdoor Unlicensed National Information Infrastructure ("U-NII") devices cannot successfully share the 5.1 GHz band under the existing rules.

The sharp rise in the noise level measured by Globalstar's satellites in the 5.1 GHz band, where Globalstar is licensed for "feeder uplink" transmissions from its gateway earth stations to its satellites, clearly seems to be caused by outdoor, high-power operation of U-NII-1 Wi-Fi access points and other devices. Thus, this noise rise is in all likelihood the result of the changes permitted by the FCC in the 5.1 GHz band in its 2014 order.

Globalstar's licensed MSS is protected against harmful interference from unlicensed U-NII-1 operations. Neither Globalstar nor any other satellite operator should have to tolerate harmful interference from unlicensed operations in its licensed spectrum. SSPI believes strongly that the Commission must remedy this situation.

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. The FCC should begin this action now by issuing a Notice of Inquiry. Waiting until Globalstar and its customers suffer potentially life-threatening service disruptions is not a viable option.

Respectfully submitted,

Robert Bell
Executive Director