

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Globalstar, Inc. Petition for Notice of)	RM-11808
Inquiry Regarding the Operation of Outdoor)	
U-NII-1 Devices in the 5 GHz Band)	

**REPLY of RUCKUS NETWORKS,
a company of ARRIS U.S. HOLDINGS, INC.**

Ruckus Networks, a company of ARRIS U.S. Holdings, Inc.,¹ respectfully submits these reply comments in opposition to Globalstar’s request for the Commission to initiate a notice of inquiry to re-evaluate continued spectrum sharing between licensed Mobile Satellite Service (“MSS”) and outdoor unlicensed devices operating in the 5 GHz U-NII-1 band.² As amply demonstrated in the record, and discussed further below, there are significant flaws with both Globalstar’s measurement data and its technical analysis in support of its Petition and, consequently, no credible basis for the Commission to initiate a notice of inquiry. The Petition should be dismissed.

Ruckus Networks has been, and continues to be, an active participant in the realization of the Commission’s innovative vision to expand the utilization of the 5 GHz U-NII-1 band. We

¹ As of December 1, 2017, Ruckus is a part of ARRIS U.S. Holdings, Inc. See Press Release, ARRIS, ARRIS Completes Acquisition of Ruckus Wireless and ICX Switch Business (Dec. 1, 2017), <http://ir.arris.com/phoenix.zhtml?c=87823&p=irol-newsArticle&ID=2319609>. Ruckus Networks is the operating name for this ARRIS company.

² See *Petition for Notice of Inquiry of Globalstar, Inc.*, RM-11808 (May 21, 2018) (“Petition”). The Consumer and Governmental Affairs Bureau put the Petition out for public comment on June 6, 2018.

have been an industry leader in providing next-generation wireless products for enabling broadband connectivity in high-density outdoor environments. As Ruckus can attest, the Commission's decision in 2014 to open the 5 GHz U-NII-1 band to unlicensed outdoor use has been an unqualified success in meeting the increasing consumer expectation that Wi-Fi services will be available at virtually all locations.³

Globalstar alleges in its Petition that, while its satellite systems are not facing interference issues today, there is a risk that its systems will experience such interference in the future from unlicensed devices operating in the 5 GHz U-NII-1 band, and therefore urges the Commission to initiate a notice of inquiry to assess the matter.⁴ These claims are without merit. As NCTA has explained in its opposition, Globalstar fails to “establish that unlicensed operations have caused the noise increase it claims to have measured” and fails to “show that the projected noise increase would actually result in harmful interference to Globalstar's system in the future.”⁵

Moreover, even assuming *arguendo* that there is a future risk of interference, existing safeguards in the Commission's rules would be sufficient to protect Globalstar.⁶ Under the Commission's rules, Globalstar could contact the Office of Engineering and Technology, which maintains a list of large outdoor U-NII-1 deployments and could assist Globalstar in resolving

³ See Wi-Fi Alliance Opposition at 5 (“Wi-Fi continues to be a critical component of U.S. wireless broadband infrastructure: it is the predominant on- and off-ramp for Internet access from U.S. homes and businesses; it supports a significant portion of wireless carriers' network traffic through offload; and it is, and will continue to be, an important part of the architecture of the Internet of Things.”).

⁴ See Petition at 2.

⁵ NCTA Opposition at 18; *see also id.* at 4-12. NCTA also explains that the U.S. contributions to ITU Working Party 5A on Wi-Fi/MSS coexistence demonstrate that Globalstar is very unlikely to experience harmful interference in the future. *See id.* at 13-14. Cisco also highlights the flaws in Globalstar's technical submissions. *See Cisco Opposition* at 6-8.

⁶ See WISPA Comments at 5-6.

any interference issues; and if necessary, Globalstar could petition the Commission for immediate regulatory relief if it experiences harmful interference.⁷

Given the absence of any demonstrated or foreseeable harm, and the availability of existing Commission remedies, there is simply no basis for the Commission to grant the Petition. Furthermore, launching a proceeding would be highly disruptive to unlicensed uses of the 5 GHz band. As Cisco points out, should the Commission take “action based on flawed analyses or mere allegations, the resulting regulatory risk will depress investment in shared bands, undermining the nation’s ability to make efficient use of spectrum, in addition to wasting Commission resources.”⁸ The Wi-Fi Alliance aptly concludes that “innovators should be able to rely on the stability created in the *2014 5 GHz Order*, less than four years ago and after a full and deliberative process by the Commission.”⁹ Ruckus wholeheartedly agrees. The Petition should be dismissed.

Very respectfully,

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⁷ See 47 C.F.R. § 15.407(j); see also *Revision of Part 15 of the Commission’s Rules to Permit Unlicensed National Information Infrastructure (U-NII) Devices in the 5 GHz Band*, First Report and Order, 29 FCC Rcd. 4127 (2014).

⁸ Cisco Opposition at 2.

⁹ Wi-Fi Alliance Opposition at 8.