



**L. Barbee Ponder IV**  
General Counsel & Vice President Regulatory Affairs

August 8, 2017

*Via Electronic Filing*

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

Re: *Written Ex Parte: Terrestrial Use of the 2473-2495 MHz Band for Low-Power Mobile Broadband Networks – IB Docket No. 13-213; Globalstar, Inc. Petition for Rulemaking to Reform the Commission’s Regulatory Framework for Terrestrial Use of the Big LEO MSS Band – RM-11685*

Dear Ms. Dortch:

On November 13, 2012, Globalstar, Inc. (“Globalstar”) submitted a Petition for Rulemaking proposing (i) a near-term plan to utilize its licensed Upper Big LEO spectrum at 2483.5-2495 MHz for a low-power terrestrial wireless service and (ii) a long-term plan to utilize its full Big LEO spectrum allocation in the 1.6 GHz/2.4 GHz band for a Frequency Division Duplex (“FDD”) LTE-based mobile broadband network.<sup>1</sup> In conjunction with its long-term FDD plan at 1.6 GHz/2.4 GHz, Globalstar requested that the Commission initiate a separate rulemaking proceeding on terrestrial wireless operations in the lower portion of the Big LEO band at 1610-1617.775 MHz.<sup>2</sup>

Globalstar now respectfully withdraws its request for a separate rulemaking proceeding regarding terrestrial wireless operations in its licensed spectrum at 1610-1617.775 MHz. Globalstar withdraws this aspect of the Petition without prejudice to any future Commission consideration of expanded terrestrial use of its licensed 1.6 GHz spectrum.

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<sup>1</sup> Petition for Rulemaking of Globalstar, Inc., RM-11685 (Nov. 13, 2012) (“Petition”).

<sup>2</sup> *See id.* at 13-15.

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Please contact the undersigned regarding any questions on this matter.

Sincerely,

/s/ L. Barbee Ponder IV  
L. Barbee Ponder IV  
General Counsel & Vice  
President Regulatory Affairs