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

November 22, 2016

Via Electronic Filing

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

In the Matter of	)	
	)	
Terrestrial Use of the 2473-2495 MHz Band	)	
for Low-Power Mobile Broadband Networks;	)	IB Docket No. 13-213
Amendments to Rules for the Ancillary	)	
Terrestrial Component of Mobile Satellite	)	
Service Systems		

Dear Ms. Dortch,

While the Bluetooth SIG welcomes any Globalstar proposal that does not require special rules for ISM band operation, the new proposal raises a number of new concerns. The revised proposal suggests using 2 different specifications for out of band emissions ("OOBE"), one for the top of the band at 2495 MHz and a completely different one for the bottom of the band at 2483.5 MHz. We are also concerned that the specifications proposed for these OOBE would result in swamping the receivers of devices particularly at the proposed 6dBW power level. In addition it is concerning that no specific technology has been identified for operation, which makes it difficult to properly assess the technical issues. We absolutely disagree with the assertion made by Globalstar in their submission that this new proposal "would raise no interference risks for unlicensed operations in the ISM band or otherwise result in costs for unlicensed systems below 2483.5 MHz."

Protecting the users of adjacent spectrum with appropriate specifications for OOBE is an accepted industry best practice, so it is both puzzling and concerning why 2 different

OOBE specifications should be proposed. Shouldn't the same specification be used at both ends of the band? Shouldn't both blocks of adjacent spectrum be protected in the same way? The Bluetooth SIG's view is that the proposal be revised so that there is a single specification for OOBE equally protective of spectrum below 2483.5 MHz as it is protective of spectrum above 2495 MHz. However, without identification of the technology that is planned to be deployed, the precise specification of any OOBE mechanism asserting to appropriately protect the users of adjacent spectrum cannot be confirmed.

While we have not completed our technical investigations, what we have learned so far is that a transmission in the 2483.5-2495 MHz band at a 6dBW power level would produce sufficiently high OOBE to affect users of spectrum at the top end of the ISM band. We plan to complete our investigation and post our results in the record. The consequences of this proposal need to be properly understood.

It makes no sense to have different OOBE specifications, neither of which may be sufficient to protect ISM band users from a relatively high power level proposed. Nor does it help to not know which technology is proposed to be deployed. As a result the Bluetooth SIG most definitely disagrees that this new proposal "would raise no interference risks for unlicensed operations in the ISM band or otherwise result in costs for unlicensed systems below 2483.5 MHz." and as a result we would urge the commission to not proceed with undue haste and instead allow time for these important concerns to be addressed.

Respectfully submitted,

On behalf of the Bluetooth SIG,

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