



1776 K STREET NW  
WASHINGTON, DC 20006  
PHONE 202.719.7000  
FAX 202.719.7049

7925 JONES BRANCH DRIVE  
MCLEAN, VA 22102  
PHONE 703.905.2800  
FAX 703.905.2820

www.wileyrein.com

October 16, 2014

R. Michael Senkowski  
202.719.7249  
msenkowski@wileyrein.com

**VIA ELECTRONIC FILING**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, N.W.  
Washington, D.C. 20554

Re: Written Ex Parte Presentation;  
*Iridium Constellation LLC Petition for Rulemaking to Promote Expanded  
Mobile Satellite Service in the Big LEO MSS-band, RM-11697;*

*Terrestrial use of the 2473-2495 MHz Band for Low-Power Mobile  
Broadband Networks; Amendments to Rules for the Ancillary Terrestrial  
Component of Mobile Satellite Service Systems, IB Docket No. 13-213, RM-  
11685*

Dear Ms. Dortch:

Iridium Constellation, LLC (“Iridium”) hereby supplements the record in the above captioned proceedings with this written *ex parte* presentation.

On October 9, 2014, Globalstar, Inc. made a presentation to investors concerning its proposed Terrestrial Low Power Service (“TLPS”).<sup>1</sup> The presentation contained maps showing Globalstar holding a nationwide “single license for TLPS” in contrast to other mobile services licenses issued for EAs or CMAs which involve hundreds of service areas and associated challenges in assembling a nationwide footprint.<sup>2</sup> The clear import of the “single TLPS license” point is that Globalstar would be able to provide TLPS service anywhere in the country. Indeed, given Globalstar’s plans to deploy “hundreds of thousands or even millions” of TLPS access points,<sup>3</sup> a reasonable assumption based on the investor presentation is that Globalstar will use its nationwide license to provide TLPS throughout the entire United States.

With respect to Mobile Satellite Services (“MSS”), Globalstar also informed investors in passing that its MSS duplex business is growing and duplex will be

<sup>1</sup> See Globalstar, *Response to Kerrisdale Capital Presentation*, <http://www.globalstar.com/en/index.php?cid=6350> (Oct. 9, 2014).

<sup>2</sup> See Attachment A.

<sup>3</sup> See Comments of Globalstar, Inc. at 11, IB Docket No. 13-213, RM-11685 (filed May 5, 2014) (“Globalstar Comments”).

Marlene H. Dortch, Secretary

October 16, 2014

Page 2

important in the future. What Globalstar's presentation does not address is the inconvenient truth that TLPS precludes duplex MSS. In its formal filings to the Federal Communications Commission ("FCC" or "Commission") in support of TLPS, Globalstar has acknowledged that wherever TLPS access points are deployed, there will be exclusion zones that preclude providing its duplex MSS at such locations.<sup>4</sup>

Iridium, for its part, takes no position on the merits of Globalstar's TLPS proposal. However, Iridium, which needs Big LEO MSS spectrum shared with or adjoining to spectrum licensed to Globalstar, has made the common sense observation that Globalstar's need for spectrum to provide MSS will be diminished as TLPS is deployed. Globalstar's response before the FCC, however, has been to suggest that TLPS would only be deployed in metropolitan areas and MSS customers only really need MSS outside metropolitan areas.<sup>5</sup> If Globalstar's plan truly is to limit TLPS deployment to select metropolitan regions, then having a single nationwide license would not be as significant as its investor presentation suggests. Instead, the TLPS map, to be accurate, would have been drawn to show TLPS service only in the major metropolitan areas, with mobile satellite services ("MSS") occupying only those areas outside our nation's cities.

Iridium notes that, contrary to Globalstar's assertion, MSS customers demand that satellite services provide reliable ubiquitous mobile coverage in populated metropolitan areas as well as the rural areas to which Globalstar will confine its service under the TLPS proposal. Indeed, as illustrated in Attachment B, Iridium's satellite network is designed to provide truly global coverage, and real-world usage data, taken from a recent one-week period, demonstrates that Iridium provides diverse satellite services to customers in urban, suburban, rural, and remote areas.<sup>6</sup> Moreover, natural disasters do not discriminate between urban and rural areas, as

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<sup>4</sup> See Globalstar Inc., Petition for Rulemaking to Reform the Commission's Regulatory Framework for Terrestrial Use of the Big LEO MSS Band, RM-11685 at 29-30 (filed Nov. 13, 2012) ("Globalstar Petition") (recognizing that MSS exclusion zones will result from the deployment of TLPS); see also Globalstar Comments at 21 (describing the need to terminate TLPS to prevent MSS interference).

<sup>5</sup> See Letter from L. Barbee Ponder IV, General Counsel & Vice President Regulatory Affairs, Globalstar, Inc., to Marlene H. Dortch, Secretary, Federal Communications Commission at 2, IB Docket No. 12-213, RM-11685, RM-11697 (filed Oct. 6, 2014).

<sup>6</sup> See Attachment B.

Marlene H. Dortch, Secretary

October 16, 2014

Page 3

the spike in Iridium MSS use after Superstorm Sandy demonstrated.<sup>7</sup> These data refute Globalstar's suggestion that MSS and terrestrial services are never operated in the same locations, and reinforce Iridium's position that the preclusive effects of TLPS will be more widely felt than Globalstar suggests.

The bottom line is that Globalstar, if its TLPS proposal is adopted, will aggressively and logically deploy its terrestrial service across the country and not on some urban gerrymandered basis. In so doing, Globalstar will inherently and inevitably constrain and diminish its MSS duplex business. As satellite services are impaired in the course of Globalstar's transition to terrestrial service, Globalstar will have a concomitant reduction in its need for 1.6 GHz Lower Big LEO band spectrum, which is used only in service of its satellite business. As Iridium documented, this spectrum could be used fully, effectively, and immediately to serve the nation's critical satellite communications needs by Iridium. Therefore, Globalstar's recent presentation provides further support for favorable action on Iridium's revised proposal to allocate a modest amount of spectrum for its system, which will ensure sufficient spectrum for continued development of critical mobile satellite services.<sup>8</sup>

Respectfully submitted,

/s/ R. Michael Senkowski

R. Michael Senkowski

Wiley Rein LLP

*Counsel to Iridium Constellation, LLC*

/s/ Donna Bethea-Murphy

Donna Bethea-Murphy

Vice President, Regulatory Engineering

Iridium Satellite LLC

Attachments

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<sup>7</sup> See Attachment C (illustrating increase in demand for Iridium's satellite services following Superstorm Sandy).

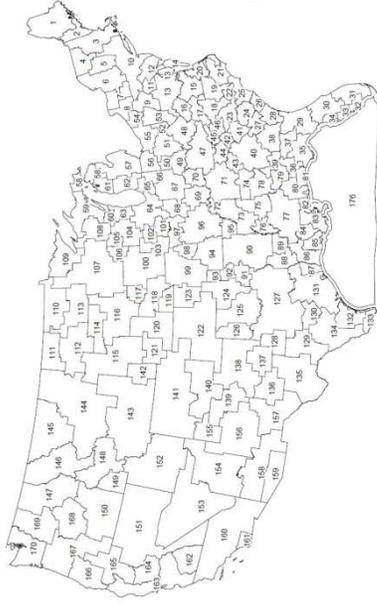
<sup>8</sup> See, e.g., Supplemental Comments of Iridium Constellation LLC, RM-11697, IB Docket No. 13-213, RM-11685 (filed May 5, 2014).

Attachment A  
Excerpt from Globalstar October 9, 2014  
Investor Presentation

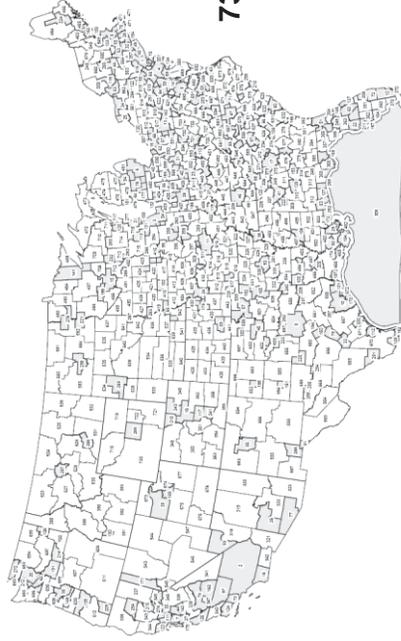
# A Single License for TLPS

Most commercial spectrum is today licensed by EA or CMA blocks. This frustrates the formation of contiguous holdings and discourages tech companies and MSO's from spectrum ownership.

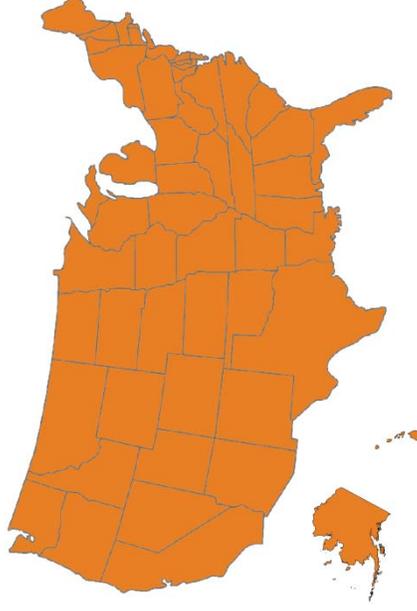
## Upcoming AWS-3 Auction



734 CMA Licenses  
(G Block)



Globalstar TLPS



1 License

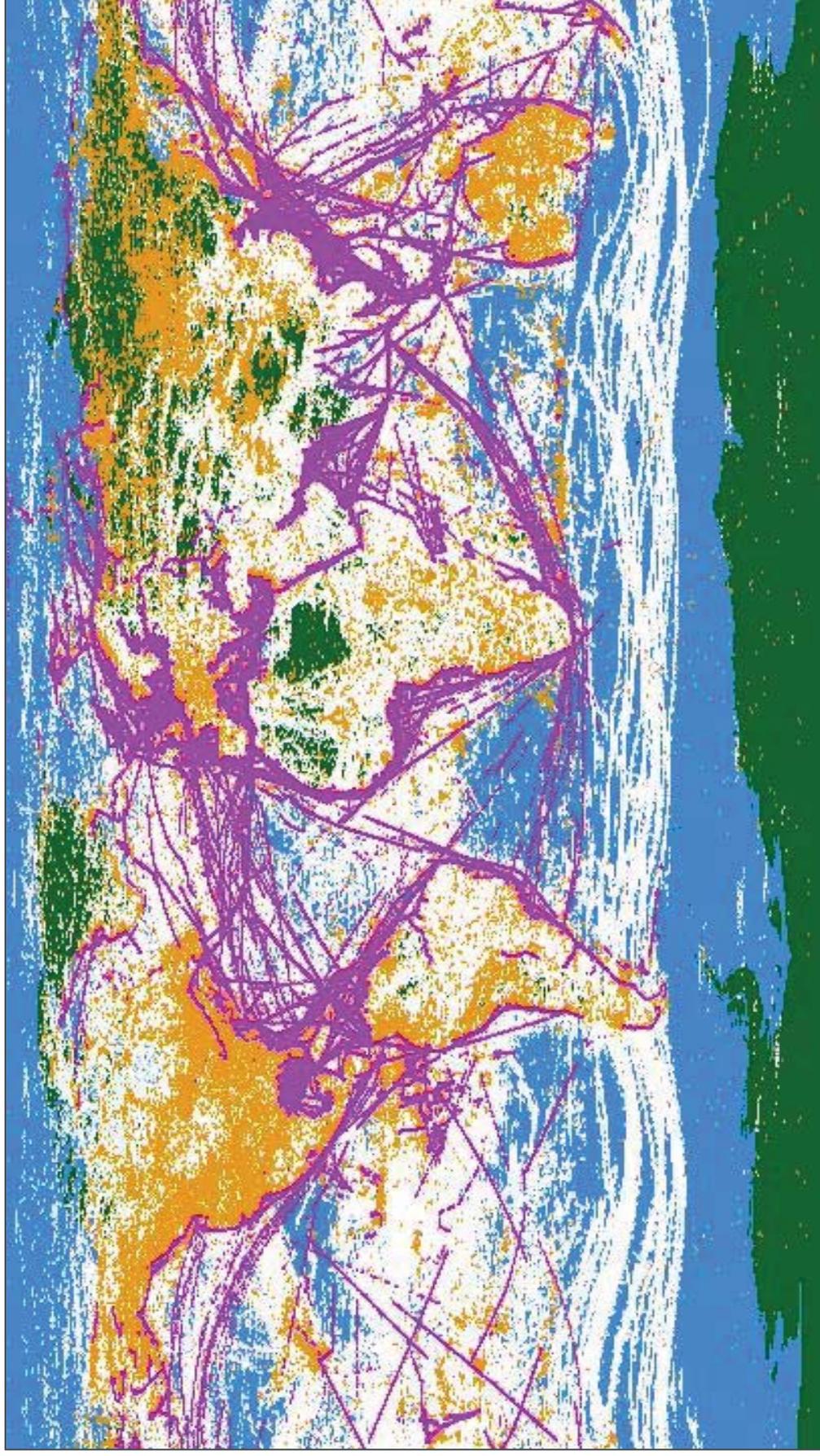


Global ITU authority and  
globally harmonized 2.4 GHz  
band

# Attachment B

# Jul 2014

## Iridium. Everywhere: Global Voice & Data Distribution



○ M2M (SBD) Data Transmission    ● Voice Call    ● OpenPort Session

One week plot of \*SBD Session, Voice Call, & OpenPort Session Origination Points  
One week : 20-Jul-2014 to 26-Jul-2014



# Attachment C

# Iridium Traffic Before and During Hurricane Sandy

