

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

In the Matter of	)	
	)	
Terrestrial Use of the 2473–2495 MHz Band for	)	IB Docket No. 13–213
Low-Power Mobile Broadband Networks;	)	RM–11685
Amendments to Rules for the Ancillary Terrestrial	)	
Component of Mobile Satellite Service Systems	)	

To: The Commission

**EIBASS *Ex Parte* Comments**

1. Engineers for the Integrity of Broadcast Auxiliary Services Spectrum (EIBASS) hereby respectfully submits its *ex parte* comments in response to the October 20, 2014,\* *ex parte* filing of Iridium Constellation LLC (Iridium) to the IB Docket 13–213 rulemaking regarding the Terrestrial Low-Power Service (TLPS) and Advanced Wireless Service Band 5 (AWS–5) proposed by Globalstar, Inc. (Globalstar).

**I. Iridium's Spectrum Charts Fail To Show *Co-channel* TV BAS Allocations**

2. EIBASS is appalled to again see that the spectrum charts submitted by Iridium fail to show 2.5 GHz TV Broadcast Auxiliary Services (BAS) operations. Although the Iridium slides show Broadband Radio Service (BRS) Channel 1†, and 2,450 MHz ±50 MHz Part 18 Industrial, Scientific and Medical (ISM) operations, the slides fail to show TV BAS A9 (2,467–2,483.5 MHz), and grandfathered TV BAS Channel A10 (2,483.5–2,500 MHz). Incredibly, also missing is 2,400–2,483.5 MHz Part 15 Wi-Fi.

3. EIBASS is therefore again making an *ex parte* filing, to correct the docket record. Corrected versions of the Iridium slides 4, 20, 23 and 42, with the missing TV BAS channels added, is attached as Figure 1. In contrast to the omitted Part 15 Wi-Fi, which is an unlicensed, unprotected, Part 15 use, TV BAS operations are a licensed Part 74 use, and therefore protected. Section 15.5(b) of the FCC rules prohibits Part 15 operations from causing interference to licensed services. And, of course, Part 15 operations must accept any interference from licensed stations. This includes grandfathered TV BAS Channel A10. As

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\* Although the Iridium *ex parte* filing is dated October 20, 2014, and posted to the ECFS on October 21, the slides are dated October 2, 2014.

† With BRS Channel 1 mislabeled as 2,495–2,500 MHz when it is actually 2,496–2,502 MHz.

**EIBASS *Ex Parte* Filing to IB Docket 13-213**  
**Terrestrial Low-Power Service/Advanced Wireless Services Band 5 (TLPS/AWS-5)**

documented by the attached Figure 2, TV BAS A10 operations are indefinitely grandfathered and co---primary with the Mobile Satellite Service (MSS).

4. Between co---primary users, the newcomer user has to demonstrate that it protects the incumbent user. As shown by the attached Figure 3, there are grandfathered A10 TV Pickup stations in many of the major population centers. Further, the Universal Licensing System (ULS) shows 565 licensed Channel A8 and A9 TV studio transmitter link (STL), Inter City Relay (ICR), TV Translator Relay and TV Pickup stations. There are also a few Part 101 mobile stations in this band, mostly used by police and sheriff departments. Broadcasters often frequency coordinate in real time with these public safety licensees. Any AWS---5 ancillary terrestrial component (ATC) MSS use would be obligated to not deploy in the operational areas of these Channel A10 TV Pickup stations, in addition to demonstrating protection of grandfathered fixed---link A10 stations and Part 101 public safety licensees.

5. EIBASS is also providing the attached Figures 4A and 4B spectrum plots, which more accurately show the frequency breaks for the 2.5 GHz band.

**II. Summary**

6. Once again EIBASS is filing rebuttal *ex parte* comments, to correct a major error of omission by Iridium in a filing to the IB Docket 13-213 proceeding.

**EIBASS *Ex Parte* Filing to IB Docket 13-213  
Terrestrial Low-Power Service/Advanced Wireless Services Band 5 (TLPS/AWS-5)**

**III. List of Figures**

7. The following figures have been prepared as a part of these IB Docket 13-213 *ex parte* comments:
1. Corrected versions of Iridium Slides 4, 20, 23 and 42
  2. CFR excerpts documenting the regulatory status of grandfathered TV BAS Channel A10
  3. Map showing operational areas of grandfathered TV BAS Channel A10 TV Pickup stations
  4. Accurate diagrams of the 2.5 GHz band.

Respectfully submitted,

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October 28, 2014

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EIBASS Ex Parte Comments To IB Docket 13-213,  
Advanced Wireless Services 5/Terrestrial Low-Power Service (AWS-5/TLPS)

More Accurate Version of Iridium Slides

from the redacted version of the October 20, 2014, Iridium ex parte filing to IB Docket 13-213

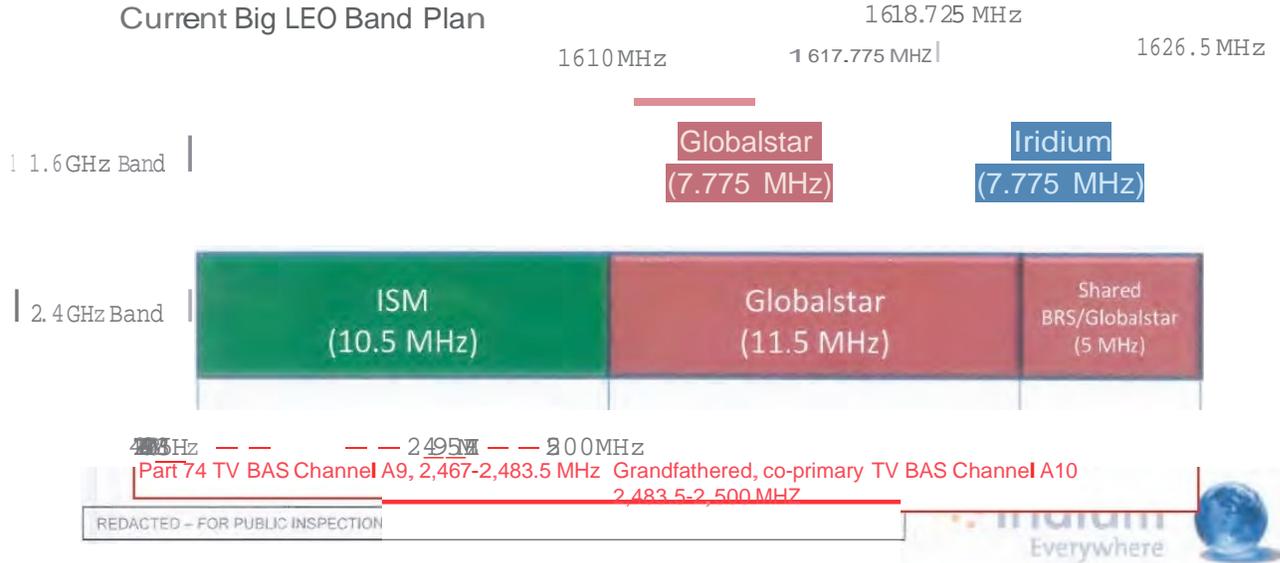
## 2007 Big LEO Band Plan

Set in 2007 Order on Reconsideration

Globalstar: 25.225 megahertz in 1.6 GHz and 2.4 GHz bands

Iridium total: 8.725 megahertz in 1.6 GHz band

This includes 0.95 megahertz shared between the operators



EIBASS Ex Parte Comments To IB Docket 13-213,  
Advanced Wireless Services 5/Terrestrial Low-Power Service (AWS-5/TLPS)

More Accurate Version of Iridium Slides

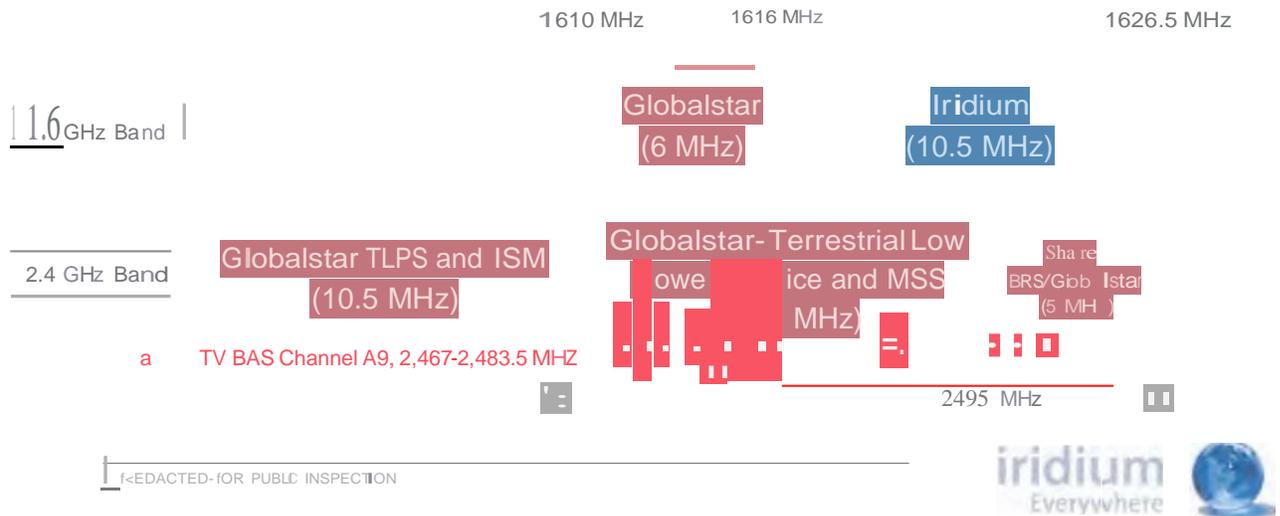
from the redacted version of the October 20, 2014, Iridium ex parte filing to IB Docket 13-213

## Iridium's Original Spectrum Petition (Feb. 11, 2013)

Sought total of 2.725 MHz new exclusive spectrum for Iridium:  
1616-1618.725 MHz (conversion of the 0.95 MHz currently shared,  
and an additional 1.775 MHz) to match Iridium's 10.5 MHz satellite  
capability

Request for consolidation to address Big LEO MSS band holistically

Iridium Original Petition for Rulemaking Proposal



EIBASS Ex Parte Comments To 18 Docket 13-213,  
Advanced Wireless Services 5/Terrestrial Low-Power Service (AWS-5/TLPS)

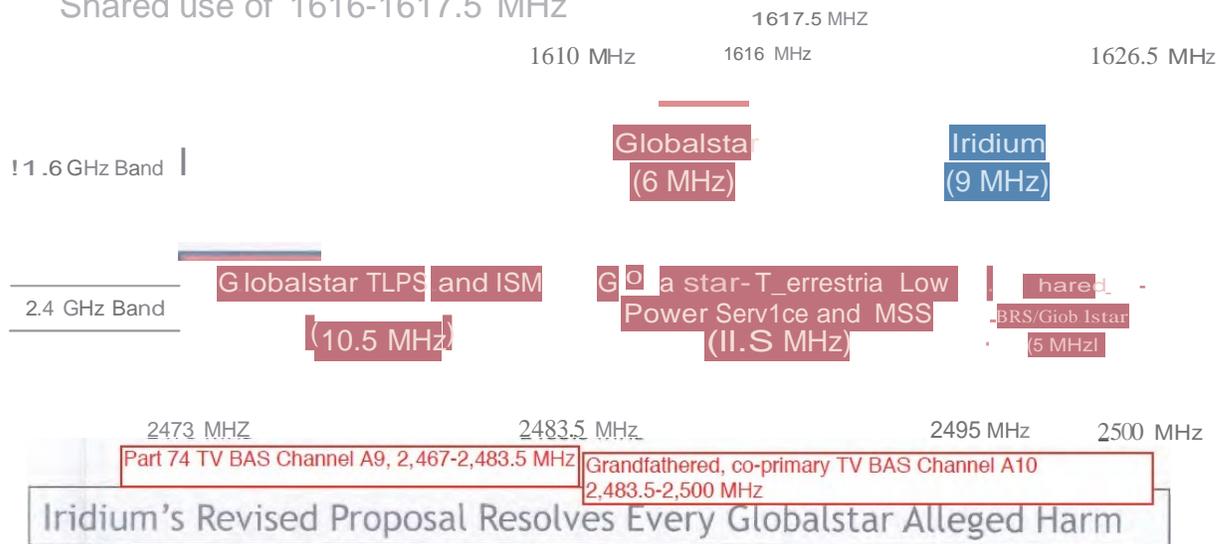
More Accurate Version of Iridium Slides

from the redacted version of the October 20, 2014, Iridium ex parte filing to IB Docket 13-213

## Iridium Revised Proposal (May 5, 2014)

Iridium exclusive use of the spectrum above Globalstar's Simplex Channel C: 1617.5-1618.725 MHz

Shared use of 1616-1617.5 MHz



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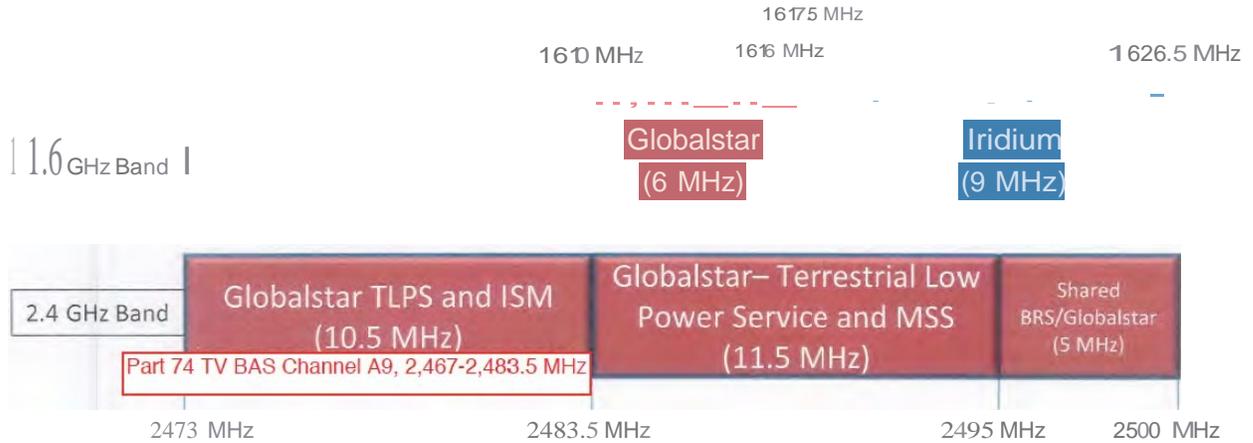


EIBASS Ex Parte Comments To IB Docket 13-213,  
Advanced Wireless Services 5/Terrestrial Low-Power Service (AWS-5/TLPS)

More Accurate Version of Iridium Slides

from the redacted version of the October 20, 2014, Iridium ex parte filing to IB Docket 13-213

## The FCC Should Grant Iridium's Revised Request



Iridium's proposal will:

Grandfathered, co-primary TV BAS Channel A10  
2,483.5-2,500 MHz

Address a growing need for additional spectrum to accommodate Iridium's current and future services

Ensure spectrum for Iridium's next generation satellite system, which will begin launch in 2015

Not interfere with Globalstar's current or future MSS or TLPS operations

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**EIBASS Ex Parte Comments To IB Docket 13-213,  
Advanced Wireless Services 5/Terrestrial Low-Power Service (AWS-5/TLPS)**

**Documentation Showing 2.5 GHz TV BAS Spectrum Allocation**

Excerpt from 47 CFR Section 2.106 (Table of Frequency Allotments):

NG147 In the band 2483.5-2500 MHz, non-Federal stations in the fixed and mobile services that are licensed under 47 CFR parts 74, 90, or 101, which were licensed as of July 25, 1985, and those whose initial applications were filed on or before July 25, 1985, may continue to operate on a primary basis with the mobile-satellite and radiodetermination-satellite services, and in the sub-band 2495-2500 MHz, these grandfathered stations may also continue to operate on a primary basis with stations in the fixed and mobile except aeronautical mobile services that are licensed under 47 CFR part 27.

**ELECTRONIC CODE OF FEDERAL REGULATIONS**

**e-CFR Data is current as of December 12, 2013**

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Title 47: Telecommunication

PART 74—EXPERIMENTAL RADIO, AUXILIARY, SPECIAL BROADCAST AND OTHER PROGRAM DISTRIBUTIONAL SERVICES

Subpart F—Television Broadcast Auxiliary Stations

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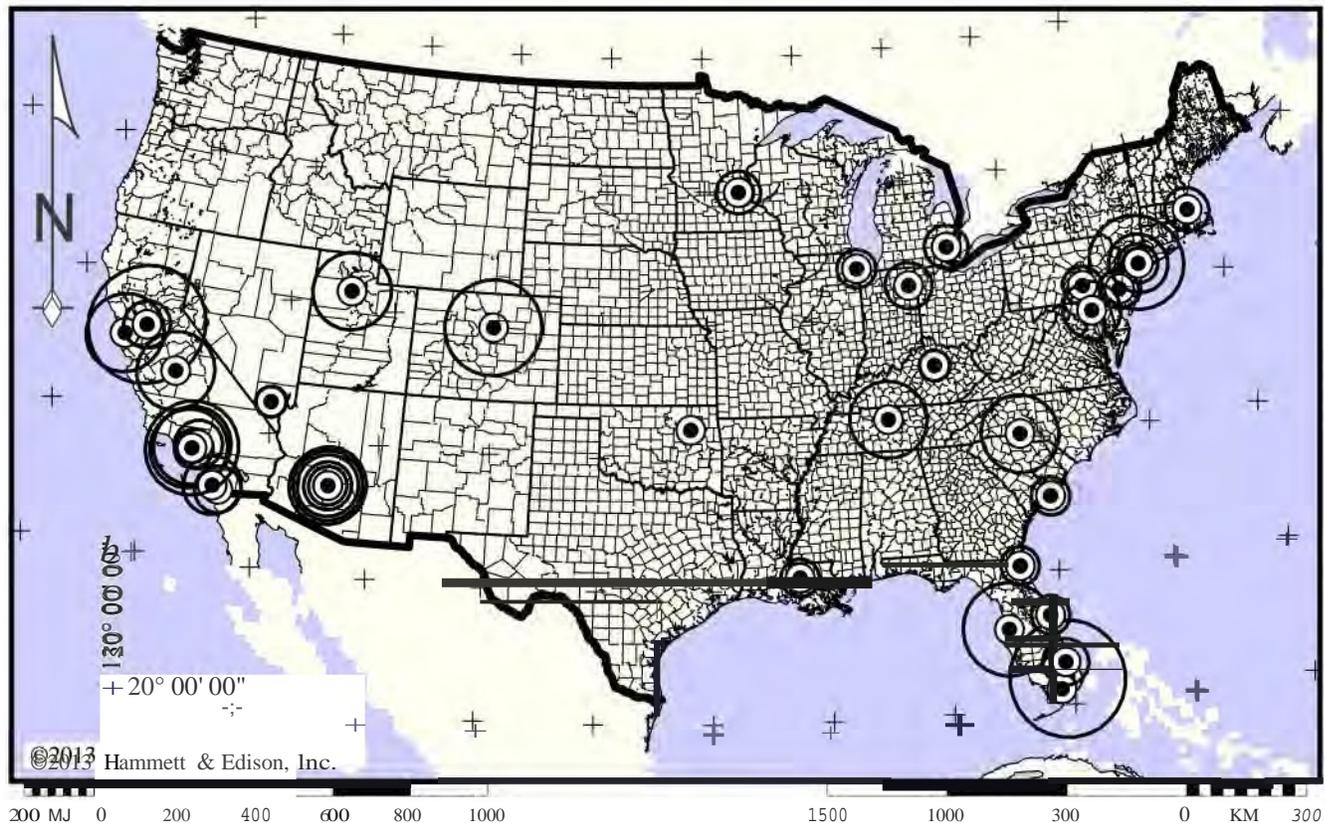
**§74.602 Frequency assignment.**

excerpt from 47 CFR Section 74.602(a)(2):

(2) In the band 2483.5-2500 MHz, no applications for new stations or modification to existing stations to increase the number of transmitters will be accepted. Existing licensees as of July 25, 1985, and licensees whose initial applications were filed on or before July 25, 1985, are grandfathered and their operations are on a co-primary basis with the mobile-satellite and radiodetermination-satellite services, and in the segment 2495-2500 MHz, their operations are also on a co-primary basis with part 27 fixed and mobile except aeronautical mobile service operations.

EISASS *Ex Parte* Filing to 18 Docket 13-213  
Terrestrial Low-Power Service/Advanced Wireless Services Band 5 (TLPS/AWS-5)

Operational Areas of Grandfathered TV BAS Channel A10 TV Pickup Stations

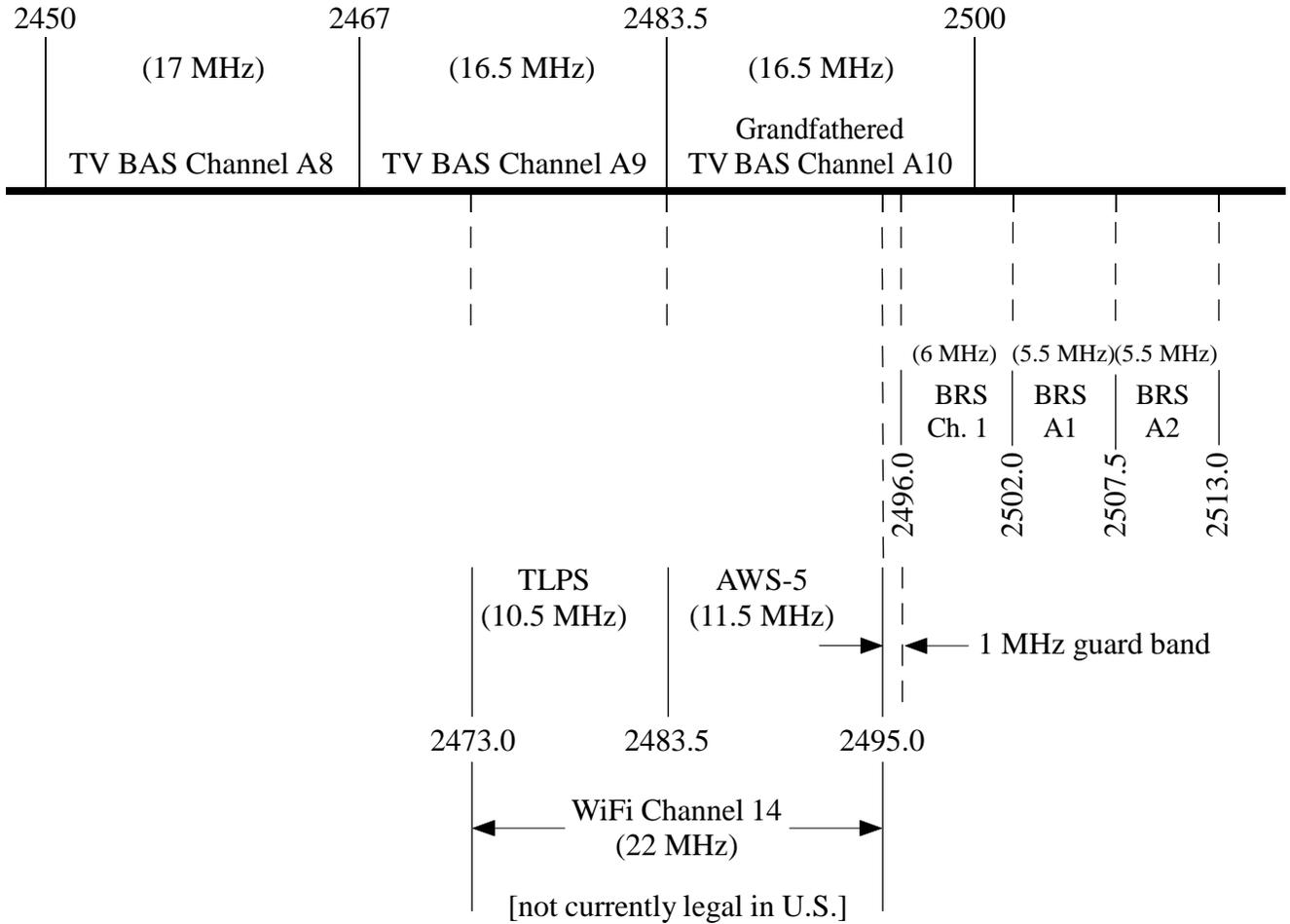


Operational areas of grandfathered TV BAS Channel A10 TV Pickup stations. Where the license specifies an ambiguous operational area, the U.S. Atlas reference coordinates for the parent TV station's city of license, and a radius of 90 miles, have been used, as the Commission did in the WT Docket 10-153 "TV BAS Flexibility" rulemaking.

Azimuthal equidistant map projection. Map data taken from Sectional Aeronautical Charts, published by the National Ocean Survey. Geographic coordinate marks shown at 5-degree increments. City limits and county lines shown taken from U.S. Census Bureau TIGER/Line 2010 data.

EIBASS Ex Parte Comments To IB Docket 13-213,  
 Advanced Wireless Services 5/Terrestrial Low-Power Service (AWS-5/TLPS)

2.5 GHz TV BAS Band



All frequencies are in MHz

**EIBASS ex parte Comments IB Docket 13-213: TLPS/AWS-5  
Terrestrial Low Power Service/ Advanced Wireless Services Band 5/**

**2.4 GHz WiFi Channels, 2.5 GHz TV BAS Channels, and TLPS/AWS-5 (MSS ATC)**

