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November 19, 2014

*Via ECFS*

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> St. S.W.  
Washington, D.C. 20045

Re: Ex Parte Notice: Terrestrial Use of the 2473-2495 MHz Band for Low-Power Mobile Broadband Networks – IB Docket No. 13-213

Dear Ms. Dortch:

WGN Continental Broadcasting Company, LLC, licensee of WGN-TV, Chicago, Illinois (“WGN”), submits this *ex parte* filing in response to the October 30, 2014, *ex parte* filing of Globalstar, Inc. (“Globalstar”) to IB Docket 13-213 (TLPS/AWS-5), and in support of the *ex parte* comments of Engineers for the Integrity of Broadcast Auxiliary Service Spectrum (EIBASS).

The Globalstar *ex parte* filing provides information on its proposed deployment of a terrestrial low-power broadband network on broadcast auxiliary service (“BAS”) frequencies in the 2.5 GHz band. The AWS-5 portion would be co-channel to grandfathered TV BAS Channel A10 stations. Globalstar does not address how newcomer co-channel AWS-5 operations would avoid interference to grandfathered A10 TV Pickup stations in many of the major metropolitan areas, including but not limited to New York City, Chicago and Los Angeles. The Commission must take steps to ensure the newcomer protects the incumbent licensees.

WGN holds a license that authorizes operation on TV Pickup Channel A10, which is essential to WGN’s news gathering purposes, and the broadcast of sporting and live events (such as recent election coverage) when channel congestion precludes the use of the other 2/2.5 GHz band BAS channels.

Interference between grandfathered TV BAS Channel A10 operations and the AWS-5 portion of TLPS/AWS-5, could, if not resolved, lead to an inability for WGN to have interference-free communications in using the A10 to cover essential news and live events.

In the public interest, WGN urges the Commission to consider the impact Globalstar's proposed operations would cause to grandfathered Channel A10 TV Pickup licensees and ensure that adequate protection measures are required by newcomer terrestrial operations in the band.

This letter is filed pursuant to Section 1.206 of the Commission's rules and should be treated as a written *ex parte* communications. Please contact the undersigned if you have any questions concerning this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "David Harpe", written in a cursive style.

/s/ David Harpe  
Vice President, Technology  
WGN Continental Broadcasting  
Company, LLC