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December 5, 2014

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

Re: *Ex Parte* Notice: *Terrestrial Use of the 2473-2495 MHz Band for Low-Power Mobile Broadband Networks* – IB Docket No. 13-213; *Iridium Constellation LLC Petition for Rulemaking* – RM-11697

Dear Ms. Dortch:

On December 3, 2014, L. Barbee Ponder IV, General Counsel & Vice President, Regulatory Affairs, for Globalstar, Inc. (“Globalstar”), Steve Berman of Lawler, Metzger, Keeney & Logan, LLC, and I met with Mindel De La Torre, Troy Tanner, Jose Albuquerque, and Karl Kensinger from the Commission’s International Bureau. At this meeting, we expressed support for the rules the Commission proposed in November 2013 to allow Globalstar to provide low-power terrestrial mobile broadband service in its own licensed spectrum at 2483.5-2495 MHz and adjacent, unlicensed spectrum at 2473-2483.5 MHz.<sup>1</sup> We urged the Commission to adopt its proposed rules expeditiously to add 22 megahertz to the nation’s wireless broadband spectrum inventory and ease the congestion that is diminishing the quality of Wi-Fi service at high-traffic 802.11 hotspots and other locations. In addition, we expressed Globalstar’s opposition to Iridium’s latest effort to appropriate a portion of Globalstar’s MSS spectrum in the Lower Big LEO band, where Globalstar is licensed to operate at 1610-1618.725 MHz.<sup>2</sup> The Commission should summarily reject Iridium’s attempt to use the Commission’s regulatory process to stifle its main competitor.

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<sup>1</sup> *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*, Notice of Proposed Rulemaking, 28 FCC Rcd 15351 (2013).

<sup>2</sup> *See* Petition for Rulemaking of Iridium Constellation LLC (Feb. 11, 2013); Supplemental Comments of Iridium Constellation, RM-11697 (May 5, 2014); Opposition of Globalstar, Inc. to Petition for Rulemaking, RM-11697 (Dec. 2, 2013); Letter from L. Barbee Ponder IV, General Counsel & Vice President, Regulatory Affairs, Globalstar, Inc., to Marlene Dortch, Secretary, FCC, RM-11697 (Oct. 24, 2014).

Ms. Marlene Dortch

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Pursuant to section 1.1206(b)(2) of the Commission's rules, 47 C.F.R. § 1.1206(b)(2), this *ex parte* notification is being filed electronically for inclusion in the public record of the above-referenced proceedings.

Respectfully submitted,

/s/ Regina M. Keeney

Regina M. Keeney

cc: Mindel De La Torre  
Troy Tanner  
Jose Albuquerque  
Karl Kensinger