

December 18, 2014

Ex Parte

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: 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:

On December 16, 2014, Rick Chessen of the National Cable & Telecommunications Association (“NCTA”), Rob Carter on behalf of NCTA, and I met with Julius Knapp, Ron Repasi, Mark Settle, Karen Rackley, and Patrick Forster of the Office of Engineering and Technology regarding the above-referenced proceedings. On December 17, 2014, Mr. Chessen and I met with Renee Gregory, Legal Advisor to Chairman Wheeler.

During these meetings, NCTA explained that, while it has no objection in principle to making more productive use of Globalstar’s MSS spectrum, those efforts should be complementary with existing and future unlicensed operations in the 2.4 GHz band. Specifically, we explained that (1) the Commission should take this opportunity to reassess the severe and unnecessary Part 15 out-of-band emissions limits in spectrum above 2483.5 MHz, which the Commission initially adopted to protect Radiodetermination Satellite Service (“RDSS”) operations, rather than Globalstar’s MSS operations; (2) the Commission should ensure that no part of Globalstar’s TLPS system receives greater protection than Part 15 operations, and should establish a safe harbor that deems all Part 15-compliant operations not to cause harmful interference to Globalstar’s proposed service; and (3) while the Commission need not conduct separate tests in this proceeding, it should not rely on Globalstar’s technical assertions regarding the impact on Wi-Fi, because Globalstar has not shared its underlying test results.

Pursuant to FCC rules, a copy of this notice is being filed electronically in the above-referenced dockets. If you require any additional information, please contact the undersigned.

Sincerely,


Paul Margie
Counsel for NCTA

cc: meeting participants