

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

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

*Further Comments and Detailed report from  
TLPS & Bluetooth Demonstrations  
FCC Technology Center - March 6, 2015*

Further to the Bluetooth SIG's Ex Parte filing of March 12<sup>th</sup> regarding the summary of findings from the TLPS and Bluetooth Demonstrations at the FCC Technology Center on March 6, 2015, the Bluetooth SIG would like to add a number of additional comments, and provide the detailed reports of the Bluetooth Demonstrations conducted by the Bluetooth SIG.

First, the Bluetooth SIG reiterates that consistent with previous communications on this matter, the demonstrations conducted by the Bluetooth SIG, and observed by representatives from Globalstar and the FCC, clearly showed that operation of TLPS interferes significantly with Bluetooth devices. Our detailed results back this up.

The Bluetooth SIG registers the following concerns about the TLPS demonstration setup that was available to the Bluetooth SIG during its demonstrations:

- It became clear during detailed review of the results and pictures taken at the event that during the Bluetooth SIG's demonstrations all the Access Points (both Wi-Fi and TLPS) had a very low level (3.7Mbs) of traffic when compared to the maximum possible for those access points (~200Mbs). Bluetooth SIG personnel had requested a higher level of traffic but the request was denied, despite the test setup clearly having the capability to add traffic, and clearly having

been operated at a higher traffic level for other tests. A traffic level of 3.7Mbs compared to 200Mbs could have been intended to produce a lower level of interference with Bluetooth.

- Bluetooth personnel also report that specific media files were used by those operating the TLPS setup for the Bluetooth demonstrations, files which may have produced a lower level of traffic.
- While the Bluetooth SIG did not previously report any details of demonstrations conducted with Bluetooth speakers, the Bluetooth SIG did conduct some preliminary tests, during which there was too much inference in the demonstration room even without TLPS to hear clear audio. As a result, the Bluetooth SIG is suspicious of the conclusions from Globalstar's Bluetooth speaker test which supposedly showed clear audio quality considering the Bluetooth SIG's finding in a Bluetooth speaker test without TLPS was the audio quality was poor.

A detailed discussion of our concerns is contained within the attached report.

The Bluetooth SIG maintains that the results of its demonstrations clearly show the potential for significant impact upon American consumers and users of Bluetooth products by a deployment of TLPS. As a result the Bluetooth SIG again requests that the FCC not approve the proposed rulemaking.

**On behalf of the Bluetooth SIG,**



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