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April 6, 2015

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20228

Re: IB Docket No. 13-213, RM-11685

Dear Ms. Dortch,

I would first like to express my appreciation to members of the Office of Engineering and Technology for the report filed on April 1, 2015. Their report provides the best available description of the setup and configuration of the various TLPS demonstrations conducted on March 6, 9, and 10, 2015.

According to Globalstar's recent filings, two Ruckus 7982 access points underwent radiated emissions testing at the FCC Laboratory in Columbia, Maryland. While it is encouraging to see TLPS-enabled hardware finally being subject to formal RF testing by someone other than Globalstar or their paid consultants, I am concerned only two of the four Ruckus 7982 access points used in the TLPS demonstrations were tested. It would have been possible for Globalstar to configure the demonstrations in such a way as to avoid the coexistence filter problem without having to modify every access point, or even every transmit chain on every access point. Avoiding the problem simply required removing a single coexistence filter from a single transmit/receive chain only on access points configured for TLPS/Channel 14 operation. If FCC Lab tests did indicate the presence of coexistence filters on all three transmit chains of both units under test, it is still possible one or more coexistence filters from the two other access points were removed.

Like the OET report filed on April 1st, the release of emissions measurement results require no FCC staff analyses or interpretation. Given details of the test environment, test equipment used (with configuration information), and the access points' transmission parameters, emissions results will speak for themselves.

For the public to understand whether Globalstar/Ruckus removed coexistence filters from the TLPS-enabled access points used in the demonstrations, the FCC should release spectrum analyzer photographs for all three transmit chains of all four access points used in the demonstrations. The spectrum analyzers should be configured as they would be for any FCC Part 15.247(d) test of the "100 kHz Bandwidth of Band Edges". If the complete set of twelve are not yet available, it would be sufficient to release available photographs now, with follow-up results if necessary.

For an "apples-to-apples" comparison, I also recommend releasing spectrum analyzer photographs of the TLPS-enabled hardware for tests configured identically to those on pages 83 and/or 85 of the Ruckus 7982 Part 15.247 test report (FCC ID: S9G-MPE2N33A, Report Number: R1110211-247, Title: "FCC PART 15.247 IC RSS-210, ISSUE 8, DEC 2010, TEST AND MEASUREMENT REPORT For Ruckus Wireless, Inc.", Test Engineers: Quinn Jiang, Report Date: 2012-02-01).

Given emissions results are already publicly available for the commercial Ruckus 7982 access point, I can't think of a reason the same data should be withheld for any of the TLPS-enabled units. After all, if Globalstar's claims are accurate, no TLPS-enabled 7982 should have required ANY hardware change.

Respectfully Submitted,

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