

April 27, 2015

Ex Parte

Ms. 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 April 23, 2015, Jennifer McKee of the National Cable & Telecommunications Association (“NCTA”), Rob Alderfer of CableLabs (by telephone), and Paul Caritj and I, of Harris, Wiltshire & Grannis met with Renee Gregory, Legal Advisor to Chairman Wheeler.

At this meeting, we discussed the recent filings by CableLabs and NCTA. We explained that CableLabs’s test report raises concerns with Globalstar’s proposed TLPS system’s potential effect on existing uses of the 2.4 GHz band.¹ In addition, we discussed aspects of Globalstar’s demonstration that render its results unreliable. As explained in NCTA’s recent filing:²

- Globalstar’s demonstration used only unrepresentative, costly, enterprise-grade TLPS access points that were designed to minimize interference to other networks;
- Globalstar reconfigured the TLPS access points to operate far below the 4 W power level at which they have sought permission to operate; and
- Globalstar demonstrated only the interference potential of operating its TLPS system under the IEEE 802.11 standard, and did not address the far more severe interference that its use of other protocols, such as LTE, could cause.

Given these shortcomings, and CableLabs’s report, we reiterated that a fuller record, and more complete, controlled testing is required before the Commission can authorize TLPS. As it has been from the beginning of this proceeding, NCTA remains eager to work with Globalstar to conduct these tests to give the Commission the information it needs to act.

Finally, we reiterated that any action on Globalstar’s TLPS proposal should be accompanied by a relaxation or elimination of the strict unwanted emissions mask that currently

¹ See Letter from Rob Alderfer, Principal Strategist, CableLabs, to Marlene H. Dortch, Secretary, FCC, Attachment, IB Docket No. 13-213 (filed Apr. 14, 2015).

² See Letter from Paul Margie, Counsel, National Cable & Telecommunications Association, to Marlene H. Dortch, Secretary, FCC, IB Docket No. 13-213 (filed Apr. 16, 2015).

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applies at the top of the 2.4 GHz unlicensed band. The Commission implemented this mask to protect a radiodetermination satellite service, not Globalstar. But Globalstar now proposes to offer a terrestrial service, not only adjacent to that service and its own MSS operations, but *co-channel* with them as well. This clearly demonstrates that this mask is not necessary to protect incumbent adjacent-band operations. Indeed, Globalstar has provided no compelling evidence that the mask remains necessary, particularly in light of recent advances in dynamic spectrum access technology.

Sincerely,

A handwritten signature in cursive script, appearing to read "A.P. Margie".

Paul Margie
Counsel to NCTA

cc: meeting participants