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May 8, 2015

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

Re: *ORAL EX PARTE PRESENTATION - WT Docket No. 03-66 and IB Docket No. 13-213*

Dear Ms. Dortch:

I am writing pursuant to Section 1.1206(b)(2) of the Commission's Rules to notify the Commission that on May 7, 2015, the undersigned Paul J. Sinderbrand and Mary N. O'Connor, counsel for the Wireless Communications Association International ("WCA"), together with WCA members John Ogren and Leigh Ann Spellman of SpeedConnect LLC, Phil Merrill and Paul Emmons of Beamspeed LLC, Gardner Foster of Sprint Corporation, Jennifer McCarthy of Nextwave HoldCo LLC, Jim McKenna of Redzone Wireless, LLC and Ken Williams of WATCH TV Company, met with Renee Gregory, Legal Advisor to Chairman Tom Wheeler. During the course of the meeting, we discussed the June 2, 2014 joint proposal of WCA, the National EBS Association, the Catholic Television Network, and other EBS licensees in WT Docket No. 03-66 for the licensing of currently unlicensed Educational Broadband Service ("EBS") spectrum, and the concerns of the Broadband Radio Service ("BRS") and EBS community regarding interference from Globalstar's proposal to deploy a Terrestrial Low Power Service ("TLPS") in the spectrum immediately adjacent to the BRS/EBS allocation.

The parties urged the Commission to move as quickly as possible in WT Docket No. 03-66 to adopt a notice of proposed rulemaking addressing the licensing of unlicensed EBS spectrum. They presented the staff with examples of rural areas that are not covered by EBS licenses and thus lack the 2.5 GHz band educational and commercial broadband services that operators are providing in areas where the EBS spectrum is fully licensed.

WCA also reiterated the concerns it has previously advanced in IB Docket No. 13-213 regarding the potential for interference from Globalstar's proposed TLPS to licensed BRS/EBS operations in adjacent spectrum. While recognizing that Globalstar has acknowledged its absolute obligation to protect BRS/EBS from interference and to accept any BRS/EBS interference, WCA noted that Globalstar has yet to carry its burden to establish that it can operate TLPS with a reduced out of band emissions mask at 2495 MHz. In addition, WCA

urged that, whatever out-of-band emissions limit the Commission imposes, Globalstar, must comply with the standard equipment authorization process with respect to each device it intends to use for TLPS to demonstrate the device will meet the required out-of-band emission limits at 2495 MHz. Finally, WCA expressed skepticism that Globalstar intends to deploy the network and other controls necessary to assure that it can cure interference caused by access points, mobile devices and other TLPS-enabled devices, and requested that the Commission require the submission by Globalstar of evidence that it will be able to control the interference caused by their devices into the 2.5 GHz band.

Pursuant to Sections 1.1206(b)(2) and 1.49(f) of the Commission's Rules, this letter is being filed electronically with the Commission via the Electronic Comment Filing System. Should you have any questions regarding this presentation, please contact the undersigned.

Respectfully submitted,

Paul J. Sinderbrand
Mary N. O'Connor
Counsel to the Wireless Communications
Association International