

# ignition

May 19th, 2015

Mr. Tom Wheeler  
Chairman  
Federal Communications Commission  
445 12th Street, N.W.  
Washington, DC 20554

Re: Terrestrial Low Power Service; IB Docket No. 13-213

Dear Chairman Wheeler:

As you know, I currently serve as partner at Ignition Partners, a venture capital fund and have had a successful history investing in telecommunications and mobile technology companies. Throughout my career, I have focused on identifying and helping build businesses in the communications space with emerging and disruptive technologies. In addition, I spent my earlier career in communications technology which included positions at British Telecom Research Laboratories, Nextlink, AT&T Wireless and McCaw Cellular Communication.

I have been following the Globalstar Terrestrial Low Power Service ("TLPS") proceeding with much interest and write to request that you move forward to adopt the rules proposed by your Commission in 2013. Spectrum is the lifeblood of any wireless service, and as consumers continue to shift their preferences to mobile broadband connectivity, new sources of spectrum must be found not only to satisfy the demand we can project today but also enable new technologies to keep up and potentially accelerate the pace of wireless innovation.

New entrants into any competitive sector of the communications industry are typically vital to the pace of development while slower moving incumbents attempt to limit available offerings and prevent anything truly innovative or disruptive like TLPS. We see the same thing happening by incumbents attempting to "commoditize" unlicensed offerings. In a world of limited spectrum supply, operators on existing useable bands will likely only provide increased resistance to efforts to free up spectrum for its highest and best use. With TLPS, situated at the edge of a critical band in 2.4 GHz which has been the backbone of the nation's and the world's wireless operations, we can benefit from an operator actively pushing to use its spectrum more intensively for terrestrial broadband. This is exactly the type of policy the Commission should be setting.

Sincerely,



Adrian Smith  
Partner, Ignition Partners

350 106<sup>th</sup> Ave NE  
1<sup>st</sup> Floor  
Bellevue, WA 98004

Telephone 425.709.0772  
Facsimile 425.709.0798  
[www.ignitionpartners.com](http://www.ignitionpartners.com)