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May 20, 2015

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

Re: *Ex Parte* Notice: *Terrestrial Use of the 2473-2495 MHz Band for Low-Power Mobile Broadband Networks* – IB Docket No. 13-213

Dear Ms. Dortch:

On May 18, 2015, David Damast of York Capital Management, Lyman Delano of Beck, Mack & Oliver LLC, Dan Mattio of Vulcan Capital, Kyle Pickens of Steelhead Partners, LLC, Jamie Zimmerman of Litespeed Management, Steve Berman of Lawler, Metzger, Keeney & Logan, LLC, and I held separate meetings with Renee Gregory, Legal Advisor to Chairman Tom Wheeler; Commissioner Michael O’Rielly, Robin Colwell, Chief of Staff and Senior Legal Advisor to Commissioner O’Rielly, and Erin McGrath, Legal Advisor to Commissioner O’Rielly; Brendan Carr, Legal Advisor to Commissioner Ajit Pai; Priscilla Argeris, Senior Legal Advisor to Commissioner Jessica Rosenworcel; and Mindel De La Torre, Jose Albuquerque, Chip Fleming, Jennifer Gilsean, Karl Kensinger, Lynne Montgomery, Sankar Persaud, and Troy Tanner of the International Bureau. Mr. Damast, Mr. Delano, Mr. Mattio, Mr. Pickens, and Ms. Zimmerman are representatives of investors in Globalstar, Inc. (“Globalstar”), a leading provider of mobile satellite service (“MSS”) in the Big LEO band.

At these meetings, we pointed out that since the deployment of its second-generation MSS constellation, Globalstar has experienced significant growth in its MSS business and expects demand for its satellite services to accelerate further after the completion of its second-generation ground infrastructure in 2016. We described Globalstar’s interest in using its spectrum more intensively for additional innovative services, and expressed support for the rules the Commission proposed in November 2013 to allow Globalstar to provide low-power terrestrial mobile broadband service (Terrestrial Low Power Service or “TLPS”) in its own licensed MSS spectrum at 2483.5-2495 MHz and adjacent, unlicensed spectrum at 2473-2483.5 MHz.<sup>1</sup> We urged the Commission to adopt its proposed rules expeditiously to add 22 megahertz

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<sup>1</sup> *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*, Notice of Proposed Rulemaking, 28 FCC Rcd 15351 (2013).

Ms. Marlene Dortch

May 20, 2015

Page 2

to the nation's wireless broadband spectrum inventory and ease the congestion that is diminishing the quality of Wi-Fi service at high-traffic 802.11 hotspots and other locations.

Pursuant to section 1.1206(b)(2) of the Commission's rules, 47 C.F.R. § 1.1206(b)(2), this *ex parte* notification is being filed electronically for inclusion in the public record of the above-referenced proceeding.

Respectfully submitted,

/s/ Regina M. Keeney  
Regina M. Keeney

cc: Commissioner Michael O'Rielly      Jose Albuquerque  
Renee Gregory                              Chip Fleming  
Robin Colwell                                Jennifer Gilson  
Erin McGrath                                 Karl Kensinger  
Brendan Carr                                 Lynne Montgomery  
Priscilla Argeris                             Sankar Persaud  
Mindel De La Torre                         Troy Tanner