

May 20, 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 May 18, 2015, Jennifer McKee of the National Cable & Telecommunications Association and I met with Priscilla Delgado Argeris, Legal Advisor to Commissioner Rosenworcel.

We discussed the demonstration report submitted by CableLabs and the concerns that these results raise regarding the potential effect of Globalstar's proposed TLPS system on existing uses of the 2.4 GHz band. We also discussed Globalstar's own demonstration and its many limitations. Globalstar used only specialized, expensive enterprise access points designed to minimize interference, designed only for indoor use, and operating at a small fraction of the radiated power level it seeks authorization to use. Moreover, Globalstar demonstrated only an 802.11-based protocol, and only demonstrated the interference caused to Wi-Fi downlink traffic, by TLPS downlink traffic. These limitations render Globalstar's demonstration an inappropriate basis for FCC decision-making.

We also discussed the filings by numerous industry and public interest groups—the Consumer Electronics Association, the Entertainment Software Association, the Wireless Internet Service Providers Association, the Wi-Fi Alliance, the Bluetooth Special Interest Group, New America's Open Technology Institute, and Public Knowledge—all of whom oppose FCC action in this proceeding, absent appropriate testing.

Sincerely,



Paul Margie
Counsel to NCTA

cc: meeting participants