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June 23, 2015

*Via Electronic Filing*

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 June 19, 2015, L. Barbee Ponder IV, General Counsel & Vice President, Regulatory Affairs, for Globalstar, Inc. (“Globalstar”), Dennis Roberson, President and Chief Executive Officer of Roberson and Associates, LLC, John Dooley of Jarvinian, Steve Berman of Lawler, Metzger, Keeney & Logan, LLC, and I met with Mindel De La Torre, Jose Albuquerque, Jennifer Gilsean, Karl Kensinger, and Robert Nelson of the Commission’s International Bureau, to urge the Commission to adopt its proposed rules expeditiously in the above-captioned proceeding.

At the meeting, we described the thorough review by the Commission and staff of the key issues in this proceeding, including consideration of the 2010 National Broadband Plan’s proposals to revise the FCC’s ancillary terrestrial component (“ATC”) policies, Globalstar’s 2012 Petition for Rulemaking, and parties’ responses to the Commission’s 2013 Notice of Proposed Rulemaking during the 2014 comment cycle. We expressed support for the Commission’s 2013 proposal to allow Globalstar to provide low-power terrestrial mobile broadband service in its own licensed spectrum at 2483.5-2495 MHz and adjacent, unlicensed spectrum at 2473-2483.5 MHz.<sup>1</sup>

We encouraged the Commission to adopt its rules to add 22 megahertz to the nation’s wireless broadband spectrum capacity and ease the congestion that is diminishing the quality of Wi-Fi service at high-traffic 802.11 hotspots and other locations. We addressed interference

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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).

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claims and technical issues, noting that the March demonstration in the Commission's Technology Experience Center showed that Terrestrial Low Power Service was compatible with existing unlicensed operations. We described the inconsistency between the opponents' arguments and alleged concern about interference to Channel 11 and their own proposals to operate on overlapping channels under new technical limits. We asked that the Commission reject the unsubstantiated technical and policy requests by these opponents – many of whom are potential competitors.

In addition to urging the Commission to grant Globalstar the proposed ATC authority, we described Globalstar's growing Mobile Satellite Services business, its \$5 billion investment in its MSS business, including its second-generation satellites, and its commitment to its current and future MSS customers.

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: Mindel De La Torre  
Jose Albuquerque  
Jennifer Gilsenan  
Karl Kensinger  
Robert Nelson