



iPass, Inc.
3800 Bridge Parkway
Redwood Shores, CA 94065

September 14, 2015

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

Dear Madam Secretary:

iPass is the world's largest Wi-Fi network, providing access to 20 million Wi-Fi hotspots in 120 countries across the globe. We are currently in the process of adding an additional 30 million hotspots to our network, which we expect to complete by the end of this year. We have aggregated this footprint by contracting with over 150 network suppliers, including firms like AT&T, Comcast, British Telecom, Deutsch Telekom, GoGo and many others, resulting in a common and seamless Wi-Fi connectivity experience globally. The breadth and accessibility to our network has attracted partners like Microsoft, who currently uses iPass to provide Wi-Fi services for Skype, and has disclosed that iPass is Microsoft's partner for Windows 10 and Office 365 Wi-Fi. Likewise, Hewlett Packard is bundling iPass Wi-Fi services in all HP laptop and tablet devices shipped in specific geographies. Combined, these two partnerships alone will expose iPass Wi-Fi to tens-of-millions of new users over the next year.

We have registered our support for TLPS in the past (re: Marcio Avillez letter to FCC Chairman Tom Wheeler dated May 12, 2015) on the basis that our service will simply perform more efficiently and effectively on Wi-Fi Channels 1, 6, and 11, or for those on TLPS, including our Microsoft and HP customers, as well as for the employees of over 700 large enterprise customers that use iPass today.

We have reviewed Globalstar's latest filing, and believe it sets a path that can give the FCC and all other users of the band confidence that TLPS will be an innovative, pro-consumer compliment to existing use of this band. In a world in which everybody wants to be connected everywhere - all the time - clearly this increase in network and bandwidth capacity is very pro consumer, while facilitating increased and continued business use of our product.

In our experience, and our review of the most recent data published by Globalstar, we conclude that this network operating system helps assure no interference, and protection that the unlicensed spectrum has not enjoyed before. While there has been much speculation about LTE in the unlicensed spectrum (LTE-U), our view is that reaching consensus on the implementation details, coupled with specific device compatibility issues, will delay the introduction for months – if not years – in an environment where network saturation is a real-time concern.

In conclusion, we believe TLPS is good for both our industry and for consumers, and would encourage the FCC to rule favorably on Globalstar's request. I would be happy to provide additional information as required.

Respectfully submitted,

A handwritten signature in black ink, consisting of a large, stylized 'G' followed by a horizontal line extending to the right.

Gary Griffiths
President and CEO

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