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September 21, 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 September 21, 2015, L. Barbee Ponder IV, General Counsel & Vice President, Regulatory Affairs, for Globalstar, Inc. (“Globalstar”), Ken Zdunek of Roberson and Associates, LLC (“Roberson and Associates”), Steve Berman of Lawler, Metzger, Keeney & Logan, LLC, and I met separately with Louis Peraertz, Senior Legal Advisor to Commissioner Mignon Clyburn; Johanna Thomas, Legal Advisor to Commissioner Jessica Rosenworcel; Brendan Carr, Legal Advisor to Commissioner Ajit Pai; and Erin McGrath, Legal Advisor to Commissioner Michael O’Rielly, regarding the Commission’s proposed rules in the above-captioned proceeding. In these meetings, we highlighted the public interest benefits of the rules the Commission proposed in 2013 and urged the Commission to adopt the rules without further delay. We also described and provided copies of Globalstar September 10, 2015 *ex parte* filing in this rulemaking, which (i) detailed the results of its recent deployment of Terrestrial Low Power Service (“TLPS”) on a Chicago, Illinois campus, (ii) provided further information concerning the network operating system and interference mitigation practices for TLPS, and (iii) committed not to deploy LTE-U in the 2.4 GHz band until the Commission has otherwise allowed LTE-U deployment to proceed in unlicensed spectrum.¹

¹ Letter from L. Barbee Ponder IV, Globalstar, Inc., to Marlene H. Dortch, FCC Secretary, IB Docket No. 13-213 (Sept. 10, 2015) and attached Declaration of Kenneth J. Zdunek, Ph.D. (Sept. 9, 2015), Presentation by Roberson and Associates, LLC, *Terrestrial Low Power Service (TLPS) Deployment and Summary Measurements* (May-August 2015), and Presentation by Globalstar, *TLPS NOS Management* (Sept. 2015), available at <http://apps.fcc.gov/ecfs/document/view?id=60001323700>.

As we described at our meetings, the recent campus deployment of TLPS, conducted by Roberson and Associates, further demonstrates the public interest benefits of the Commission's proposed rules.² Adding 22 MHz channel (TLPS Channel 14) to the campus's 2.4 GHz Wi-Fi network enabled students, faculty, and other users to spread their wireless broadband usage over four rather than just three channels in this band. With the deployment of TLPS, aggregate throughput for these users increased by more than 90%. This near-doubling of network throughput improved the experience for all users – even those who remained on Channels 1, 6 and 11.

The benefits of TLPS will be particularly important in America's schools and libraries, high-density environments with substantial wireless broadband usage that will only increase over time. Globalstar has committed to provide up to 20,000 TLPS access points free of charge to public and non-profit schools, libraries, community colleges, and hospitals, and this commitment along with the Commission's adoption of TLPS rules can help ensure that these often underfunded organizations have affordable, high-capacity broadband that meets their communities' needs.

The Chicago deployment also confirmed that there are no interference or compatibility issues between TLPS and Wi-Fi, nor with TLPS and Bluetooth operations in the 2.4 GHz ISM band. While the record in this proceeding shows that TLPS will not have any detrimental impact on unlicensed services, Globalstar nevertheless commits to employ interference detection and mitigation techniques as part of any commercial TLPS offering. TLPS will be a managed service with networked access points controlled through a carrier-grade network operating system ("NOS") analogous to the systems used to manage pico- and femto-cellular infrastructure. Globalstar's NOS will provide a rapid-response platform for operators of licensed and unlicensed services to provide notice of any claimed interference to their services, and mitigation of harmful interference in the highly unlikely event that it occurs.

We also addressed concerns from some commenters regarding Globalstar's potential deployment of wireless broadband services based on an LTE-U wireless protocol. As Globalstar indicated in its September 10 filing, its TLPS offering is and has always been based on the IEEE 802.11 protocol, not LTE, given the immediate consumer benefits available from the 802.11 ecosystem. Globalstar has no objection to the FCC prohibiting it from deploying any LTE-U or LAA service which might raise concerns in the 2.4 GHz band until such time as the Commission has otherwise allowed the deployment of these services to proceed in unlicensed spectrum.

² See Globalstar Experimental License, Call Sign WH2XNQ (effective April 2, 2015).

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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: Louis Peraertz
Johanna Thomas
Brendan Carr
Erin McGrath