



Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

October 23, 2015

Via Electronic Filing

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

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| In the Matter of |) | |
| |) | |
| Terrestrial Use of the 2473-2495 MHz Band |) | |
| for Low-Power Mobile Broadband Networks; |) | IB Docket No. 13-213 |
| Amendments to Rules for the Ancillary |) | |
| Terrestrial Component of Mobile Satellite |) | |
| Service Systems |) | |

Dear Ms. Dortch,

The Bluetooth SIG and its 28,000 Member companies would like to point out that despite a recent filing by Globalstar on September 10th 2015 detailing yet another demonstration of TLPS by Globalstar, the position of the Bluetooth SIG and its Member companies remains unchanged:

- TLPS interferes with Bluetooth potentially causing detrimental impact to hundreds of Millions of Bluetooth devices including those associated with essential healthcare and emergency services, as shown in the Bluetooth SIG demonstrations at the FCC Technology Experience Center in March 2015, and
- It is wrong that one company can have its own rules for operating in the ISM band when tens of thousands of other companies are obliged to follow a different set of rules. Wrong in principle and wrong for the industry to allow this.



After reviewing the details of the recent Globalstar filing the Bluetooth SIG makes the following observations:

- The filing reports another “demonstration” by Globalstar that proves nothing and is as vague and non-transparent as the prior Globalstar demonstrations. Details of the Bluetooth testing included in their filing were almost insulting in their lack of detail and specificity. It is amazing that any conclusion could be drawn.
- The Bluetooth SIG was also not aware of these recently conducted demonstrations, was not invited to participate (despite having made repeated offers previously) and was not consulted in the construction of a suitable and appropriate testing plan. The Bluetooth SIG can only assume that the lack of transparency and lack of industry involvement is an indication that there is real cause for concern that proper testing would expose.
- The companies and organizations in the wireless industry are used to participating in rigorous, transparent and well conducted testing in order to make technical advances and establish technical principles. It is alarming that Globalstar thinks that conclusions can be drawn when such testing has not been conducted in this matter.

The demonstrations and filings by Globalstar have also not established a coherent case as to why they should be exempt from the rules governing the use of the ISM band, exemptions that would be necessary to operate TLPS as proposed from rules that are important for efficient use of the ISM band, rules that tens of thousands of companies follow, rules that are essential to preserve the best consumer experience.

It is disappointing how much time and effort is being wasted by the FCC and the industry on this matter and the Bluetooth SIG echoes calls by others to close this proceeding and deny the Globalstar request.

Respectfully submitted,

On behalf of the Bluetooth SIG,

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