



WASHINGTON, DC

December 10, 2015

STEPHEN E. CORAN
202.416.6744
SCORAN@LERMANCENTER.COM

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: Notice of Oral Ex Parte Presentation
IB Docket No. 13-213**

Dear Ms. Dortch:

On December 9, 2015, undersigned counsel to the Wireless Internet Service Providers Association (“WISPA”) met with Edward Smith, Legal Advisor to Chairman Tom Wheeler, to summarize WISPA’s views on Globalstar’s proposed Terrestrial Low Power Service (“TLPS”).

I pointed out that, although WISPA had maintained an open mind about Globalstar’s proposal since Globalstar filed its petition for rulemaking, WISPA’s two major concerns have not been addressed.¹ First, Globalstar has failed to demonstrate that TLPS operations will not cause harmful adjacent-channel interference to millions of broadband, utility and consumer devices using Wi-Fi Channel 11, including WISP networks that provide broadband service to consumers. Second, Globalstar has failed to explain whether the public would have access to Wi-Fi Channel 14 spectrum, leading to questions about whether Globalstar would “privatize” the unlicensed frequencies through a device authentication requirement. I further stated that Globalstar has resisted WISPA’s efforts to engage in cooperative testing to determine whether and to what extent TLPS operations would interfere with WISP operations. I explained that Globalstar’s failure to resolve these concerns over the course of this proceeding has exacerbated WISPA’s concerns.

I stated that the Commission had required Progeny, a Commission *licensee*, to conduct field tests to demonstrate whether its operations would cause unacceptable levels of interference to unlicensed operations,² and that the case for requiring testing of the effects of TLPS *unlicensed* operations on deployed *unlicensed* devices was even stronger in this case.

¹ See WISPA Comments, RM-11685 (filed Jan. 14, 2013); WISPA Comments, IB Docket No. 13-213 (filed May 5, 2014); WISPA Reply Comments, IB Docket No. 13-213 (filed June 4, 2014).

² See *Request by Progeny LMS, LLC for Waiver of Certain Multilateration Location and Monitoring Service Rules*, 26 FCC Red 16878 (2011); *Request by Progeny LMS, LLC for Waiver of Certain Multilateration Location and Monitoring Service Rules*, 28 FCC Red 8555 (2013). See also 47 C.F.R. § 90.353(d).

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Marlene H. Dortch, Secretary
December 10, 2015
Page 2

Consistent with WISPA's May 29, 2015 ex parte letter,³ I stated that the record fails to demonstrate that Globalstar has met its burden to show that its TLPS proposal would promote the public interest.

Pursuant to Section 1.1206 of the Commission's Rules, this letter is being filed electronically via the Electronic Comment Filing System in the above-captioned proceeding.

Respectfully submitted,



Stephen E. Coran

cc: Edward Smith

³ See Letter from Stephen E. Coran, WISPA Counsel, to Marlene H. Dortch, FCC Secretary, IB Docket No. 13-213 (filed May 29, 2015).