

LAWLER, METZGER, KEENEY & LOGAN, LLC

2001 K STREET, NW
SUITE 802
WASHINGTON, D.C. 20006

REGINA M. KEENEY

PHONE (202) 777-7700
FACSIMILE (202) 777-7763

March 22, 2016

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:

L. Barbee Ponder IV, General Counsel & Vice President, Regulatory Affairs, for Globalstar, Inc. (“Globalstar”), spoke by telephone on March 18, 2016, with Jose Albuquerque and Chip Fleming, Chief and Chief Engineer, respectively, of the International Bureau’s Satellite Division, regarding the Commission’s proposed rules in the above-captioned proceeding.¹ Mr. Ponder spoke again by telephone with Mr. Albuquerque on March 22, 2016, regarding the same proceeding. On these calls, Mr. Ponder expressed support for the Commission’s proposed rules and urged the Commission to permit Globalstar to offer Terrestrial Low Power Service (“TLPS”). Mr. Ponder emphasized the compatibility of TLPS with other services and addressed safeguards that will minimize any risk of disruption, including effective equipment certification procedures and Globalstar’s proposed network operating system (“NOS”).

Mr. Ponder explained that TLPS access points and client devices certified to operate on IEEE Channel 14 will continue to meet the Commission’s existing out-of-band emissions requirements (including Sections 15.205 and 15.209 of the FCC’s rules) when operating on IEEE Channel 11. Globalstar expects that all existing Wi-Fi-equipped smartphones, tablets, and other client devices can be upgraded via software or firmware updates to operate on Channel 14. It is possible that certain client devices may need a hardware modification to provide a commercially acceptable level of performance on Channel 14, but Globalstar is not aware of any specific device make or model that would require such modification. Finally, as previously explained in this proceeding, Globalstar’s production-model TLPS access points will require connection to,

¹ *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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and authentication by, the Globalstar NOS in order to operate on Channel 14. Globalstar can thus prevent or terminate the operation of any TLPS access point moved to a different, unauthorized location.

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: Jose Albuquerque
Chip Fleming