

March 25, 2016

Ex Parte

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

Re: 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, IB Docket No. 13-213, RM-11685;

*Office of Engineering and Technology and Wireless Telecommunications Bureau
Seek Information on Current Trends in LTE-U and LAA Technology, ET Docket No.
15-105*

Dear Ms. Dortch,

On March 23, 2016, Rick Chessen of the National Cable & Telecommunications Association, Rob Alderfer of CableLabs, Paul Caritj of Harris, Wiltshire & Grannis, and I met with Edward Smith, Legal Advisor to Chairman Wheeler.

In that meeting, we discussed the limitations of Globalstar's demonstrations of its proposed TLPS system. We explained that, due to these shortcomings, Globalstar's demonstrations are an inappropriate basis for any FCC decision in this proceeding.

We also discussed the necessary parameters of any future testing to ensure that such tests are more reliable in studying whether TLPS would harm the millions of American consumers who rely on Wi-Fi and Bluetooth. In Globalstar's previous demonstrations, it used sophisticated access points capable of minimizing interference through the use of (1) beam forming, (2) transmit power control, (3) dynamic antenna polarization, (4) an IEEE 802.11 protocol (which includes important mechanisms to minimize interference), and (5) equipment configured to operate at power levels below 100 mW. Globalstar's assertions on the record depend on these demonstrations. The FCC should limit its consideration of new rules to operations that mandate each of these techniques, and consider only future tests that employ these techniques. This is critical to ensuring that tested interference risks are similar to what Globalstar's technology would produce if approved. Deployments at higher power levels, using a different protocol, and without the other interference mitigation technologies that Globalstar has used in its demonstrations, would present significantly different interference risks.

We also discussed that recent Globalstar demonstrations occurred at sites that were not disclosed in advance to Wi-Fi and Bluetooth stakeholders, parties did not have access to the sites

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to conduct their own tests, and equipment and operating parameters were not disclosed properly. This rendered these demonstrations unreliable for FCC decision making. Such demonstrations fail to provide the objective, reproducible, and representative results necessary to support FCC action. In addition, we discussed that establishing objective metrics by which to evaluate the results of any future tests on throughput, latency, and jitter, is needed to make such tests reliable.

On a separate matter, we also provided an update on progress by the Wi-Fi Alliance towards finalizing a test plan for evaluating the effect of LTE-U on Wi-Fi consumers.

Pursuant to the FCC's rules, I have filed a copy of this notice electronically in the above-referenced proceeding. If you require any additional information, please contact the undersigned.

Sincerely,

A handwritten signature in cursive script, appearing to read "A.P. Margie".

Paul Margie
Counsel to NCTA

cc: Edward Smith