



REQUEST FOR CORRECTION TO:

Report: TR 15-1002 ELECTROMAGNETIC EMISSIONS CHARACTERIZATION OF SAMPLES USED AT TLPS DEMONSTRATION

Page 8 of the report referenced above¹, filed by the Office of Engineering and Technology to IB Docket 13-213 on May 7, 2015, states:

1.1 Executive Summary

The primary purpose of this testing was to characterize the electromagnetic emissions profile of sample devices that Globalstar, Inc. (Globalstar) used in a recent demonstration of its proposed terrestrial low power service (TLPS) at the FCC Technology Experience Center. The sample devices provided for these tests were manufactured by Ruckus Wireless and contained modular transmitters approved under Sections 15.247 and 15.407 of the Commission's rules. The objective of this testing was to characterize the transmission profile of the devices; there was no intent or effort to perform comprehensive compliance testing.

The phrase underlined above can only be valid if the specific Ruckus Wireless units' (S/N 471473600229 and S/N 141403003812) hardware is identical² to the units tested in the equipment authorization process for S9G-MPE2N33A, S9G-MPE5N33A.

Engineering analysis filed to IB Docket 13-213 on May 14, 2015³ (and July 27, 2015⁴) shows the TLPS-enabled hardware used in the March 2015 TLPS Demonstration and tested by the OET is not identical to the units tested in the equipment authorization process for S9G-MPE2N33A, S9G-MPE5N33A. Therefore, underlined phrase is incorrect and should be removed from the report.

The OET can contact Globastar and/or Ruckus for confirmation that the TLPS-enabled Ruckus hardware was modified from the commercial version. For reasons provided to Commission staff and in the filings referenced above, the OET should also ask why the TLPS-enabled Rucks hardware was modified, and the specific modifications that were made.

Respectfully Submitted,

Greg Gerst
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¹ See Report: TR 15-1002 "ELECTROMAGNETIC EMISSIONS CHARACTERIZATION OF SAMPLES USED AT TLPS DEMONSTRATION" (May 7, 2015)

² The word "identical" is used as defined in 47 CFR 2.908 (<https://www.law.cornell.edu/cfr/text/47/2.908>) which states "As used in this subpart, the term identical means identical within the variation that can be expected to arise as a result of quantity production techniques."

³ See Letter and Attachment from Gerst Capital to Marlene H. Dortch, Secretary, IB Docket 13-212 (May 14,2015).

⁴ See Letter and Attachment from Gerst Capital to Marlene H. Dortch, Secretary, IB Docket 13-212 (July 28,2015), Page 3 of letter, Attachment slides 16-20.