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VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20228

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

Re: File No. 0224-EX-PL-2016

Dear Ms. Dortch,

I am respectfully requesting the FCC to take immediate action on the following proceeding: Terrestrial Use of the 2473-2495 MHz Band for Low-Power Mobile Broadband Networks – IB Docket No. 13-213. Also I wish to express my concerns with Google’s experimental license filing with File No. 0224-EX-PL-2016.

It was recently brought to the public’s attention through an article by FierceWirelessTech titled “Google files for experimental license to test in 2.5GHz band in California” that Google wanted to test 2.5GHz band in the Educational Broadband Service (EBS) for use of the spectrum. I recalled that Globalstar has submitted to the FCC to get approved the use of the 2.4GHz band through IB Docket No. 13-213 to use its spectrum. Now during the preceding Globalstar has been constantly challenged by Google through expartes. For example, on April 5, 2016 Google filed an exparte in which it asked the FCC at a minimum, “Globalstar should be required to 9a) publish all protocol(s) its Network Operating System (NOS) uses to authorize spectrum used by TLPS devices in Channel 14 and (b) demonstrate that the NOS is capable of exchanging with non-TLPS devices all information needed for spectrum use in Channel 14, without reliance on non-public protocols or standards.” My question to the FCC committee is why should Globalstar provide the keys to their technology when their competitor (Google) is in the hunt for the same technology? With Google wanting to use the 2.5GHz range would they be willing to divulge their technology to their competitors? The answer to that question, I would argue is no. Even in the FierceWirelessTech article Google was quoted as saying they did not want to divulge their experimental usage of 2.5GHz because “the information were to be made public, it would cause significant commercial, economic and competitive harm.” So I would further ask the FCC committee if Google is being hypocritical in writing all these expartes demanding certain

requirements of Globalstar when Google seeks to do the opposite in their FCC process for use of 2.5GHz?

Also very troubling in the Google expartes is the common reference of general public use. Specifically in the exparte submitted on April 5, 2016 it states “We observed that if the Commission were to allow Globalstar to test deployment of a proprietary Wi-Fi type service in unlicensed 2.4GHz spectrum on a preferential basis (which the Commission should not do), then such a trial should both protect and advance options for future use of Wi-Fi Channel 14 by the general public.” Now I am very grateful that Google cares about the general public but my question becomes, will Google return the same favor using the 2.5GHz as they have requested on Globalstar? Also, Google has stated that if Globalstar should not fully use all of 2.4GHz band in a certain time period then it should be made open to the general public. My question to the FCC committee is will Google agree to the same terms with 2.5GHz?

Throughout this whole process Globalstar has shown its support for more usage of spectrum in different frequencies such as 5GHz and never once have they laid such outlandish request as the one being made by Google to the FCC. If Google is trying to help the general public gain from spectrum then why hold up the process to unleash more spectrum by the 2.4GHz range if they are planning on doing the same thing in the 2.5GHz range?

The way the general public can prosper is through more competition which the FCC has said they are hoping to strive for. If Google truly believes spectrum can help the general public then they should be helping to gain more access to spectrum and not hindering it when they themselves plan on unveiling their 2.5GHz spectrum usage plan.

I ask the FCC committee if you see the inconsistency that is taking place on what Google is asking of Globalstar and what Google is asking for itself with the FCC?

In closing, I have no doubt the FCC will make the right decision in approving Globalstar’s request. Remember, approval of Globalstar petition is an approval for more competition and a win for the common consumer.

Respectfully,

Jeremy L. Berry, FRM, ERP, CMA