

LAWLER, METZGER, KEENEY & LOGAN, LLC

1717 K STREET, NW  
SUITE 1075  
WASHINGTON, D.C. 20006

REGINA M. KEENEY

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

May 25, 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:

On May 23, 2016, L. Barbee Ponder IV, General Counsel & Vice President, Regulatory Affairs, for Globalstar, Inc. (“Globalstar”), Steve Berman of Lawler, Metzger, Keeney & Logan, LLC, Joshua Lamel of BGR Group, and I met with Commissioner Jessica Rosenworcel and Johanna Thomas, Legal Advisor to Commissioner Rosenworcel, and, separately, with Commissioner Michael O’Rielly and Erin McGrath, Legal Advisor to Commissioner O’Rielly, regarding the Commission’s proposed rules in the above-captioned proceeding. Also on this date, Mr. Ponder, Mr. Berman, and I met with Daudeline Meme, Legal Advisor to Commissioner Mignon Clyburn, while on May 24, 2016 we met with Brendan Carr, Legal Advisor to Commissioner Ajit Pai, regarding this proceeding.

In these meetings, we discussed Globalstar’s continuing commitment to the success of its mobile satellite service (“MSS”) operations. Globalstar has invested more than \$5 billion in its MSS network, including almost \$1 billion in its second-generation satellites and approximately \$200 million in its second-generation ground infrastructure and product development. Globalstar’s MSS business is growing, and will grow further with this year’s deployment of its second-generation ground network. Globalstar’s global MSS system serves traditional enterprise segments but also has a growing and innovative suite of consumer products, including products that play an important public safety role. Globalstar is the only MSS company with material consumer offerings. Since 2007, over 4,100 rescues have been initiated by customers using Globalstar’s SPOT family of products and services. This year, Globalstar will introduce a two-way SPOT texting device that will break new ground for satellite products with respect to functionality, ease-of-use, and affordability.

We also discussed at these meetings the significant public interest benefits that would be generated by allowing Globalstar to provide low-power mobile broadband service in its 2.4 GHz spectrum and adjacent unlicensed frequencies. By permitting Globalstar to provide its proposed Terrestrial Low Power Service (“TLPS”), the Commission will add 22 *megahertz* to the nation’s broadband spectrum inventory, furthering the goal of adding 500 megahertz for mobile broadband. TLPS on Channel 14 will ease the congestion that is diminishing the quality of 2.4 GHz Wi-Fi service at high-traffic 802.11 hotspots and other locations. The benefits of this innovative service were confirmed by Globalstar’s demonstrations of TLPS at the FCC’s Technology Experience Center (“TEC”), and in deployments at a Chicago university and the Washington School for Girls. In each of these environments, activating TLPS on non-overlapping Channel 14 significantly increased aggregate data throughput across the 2.4 GHz 802.11-capable spectrum.

As we explained, TLPS will be a good neighbor to other licensed and unlicensed services. The record evidence demonstrates the substantial public interest benefits of TLPS as well as the compatibility of TLPS with unlicensed services and other wireless operations. The evidence of benefits and compatibility in this proceeding substantially outweigh the theoretical concerns raised by competitors. In addition, while detrimental interference to other services is highly unlikely, Globalstar will nonetheless employ interference detection and mitigation techniques as part of its TLPS offering. TLPS will be a managed service with networked access points controlled through a carrier-grade network operating system (“NOS”) analogous to the systems used to manage pico- and femto-cellular infrastructure. Globalstar’s NOS will be used to authenticate users on the TLPS network, ensure the security of TLPS operations, give operators of licensed and unlicensed services a means to assert interference, and mitigate harmful interference in the highly unlikely event that it occurs.

We also pointed out that a number of parties in the proceeding declined to participate fully - *or at all* - in the TEC demonstration and the Columbia, Maryland laboratory tests conducted by the Office of Engineering and Technology in March 2015. We discussed the Bluetooth Special Interest Group’s (“Bluetooth SIG’s”) hearing aid demonstration at the TEC and the absence of any perceptible audio degradation when TLPS access points were activated. We noted that the Bluetooth SIG has refused to provide Globalstar or the Commission with its demonstration data. The failure of Bluetooth and Wi-Fi interests to disclose their data from the TEC demonstration is telling. Notably, Globalstar has provided its TEC demonstration data to all requesting parties.

Globalstar’s representatives also expressed support for a staged deployment of TLPS. We explained that such a balanced and pragmatic approach would permit Globalstar to expand its TLPS operations gradually across the United States, while providing extra safeguards to existing licensed and unlicensed services.<sup>1</sup>

---

<sup>1</sup> As we noted, a similar approach can be found in *SafeView, Inc., Request for Waiver of Sections 15.31 and 15.35 of the Commission’s Rules to Permit the Deployment of Security Screening Portal Devices that Operate in the 24.25-30 GHz Range*, Order, 21 FCC Rcd 8814 (OET 2006).

Ms. Marlene Dortch

May 25, 2016

Page 3

Finally, we expressed our appreciation for the extraordinary effort of the Commission and staff to bring this proceeding to a successful and balanced conclusion. With these efforts, rules permitting TLPS will enable consumers across the country to enjoy the significant public interest benefits of TLPS demonstrated in Chicago and Washington, D.C.

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: Commissioner Jessica Rosenworcel  
Commissioner Michael O'Rielly  
Brendan Carr  
Erin McGrath  
Daudeline Meme  
Johanna Thomas