

June 6, 2016

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554

Re: *Terrestrial Use of the 2473-2495 MHz Band for Low Power Mobile  
Broadband Networks – IB Docket No. 13-213 – ORAL EX PARTE  
PRESENTATION*

Dear Ms. Dortch:

I am writing pursuant to Section 1.1206(b)(1) of the Commission's Rules to notify the Commission that on June 2, 2016, the undersigned Paul J. Sinderbrand and Mary N. O'Connor, counsel for the Wireless Communications Association International ("WCA"), together with Gardner Foster of Sprint Corporation, met with Johanna Thomas, Legal Advisor to Commissioner Jessica Rosenworcel and with Erin McGrath, Legal Advisor to Commissioner Michael O'Rielly. During the course of the meetings we discussed the concerns of the Educational Broadband Service ("EBS") and Broadband Radio Service ("BRS") community regarding the Commission's Order circulating that could result in Globalstar's deploying Terrestrial Low Power Service ("TLPS") in the spectrum immediately adjacent to the BRS/EBS allocation.

We reiterated the importance of preserving Globalstar's existing absolute obligation to protect adjacent licensed BRS and EBS operations from harmful interference. We also expressed our ongoing concern over a proposed 40 + 10 log (P) out-of-band emissions ("OOBE") mask for TLPS, emphasizing the lack of any record or testing to support the adoption of a more lenient mask. We noted the fundamental differences between the present situation and the Commission's decision, at WCA's request, to adopt a 40 + 10 log (P) OOBE limit for mobile BRS/EBS devices.<sup>1</sup> To begin with, we pointed out that the BRS/EBS 40 + 10 log (P) mask only applies to mobile devices, while BRS/EBS base stations and other fixed facilities remain subject

---

<sup>1</sup> Amendment of Parts 1, 21, 73, 74 and 101 of the Commission's Rules to Facilitate the Provision of Fixed and Mobile Broadband Access, Educational and Other Advanced Services in the 2150-2162 and 2500-2690 MHz Bands, *Fifth Report and Order*, 29 FCC Rcd 6331, 6338 ¶ 8 (2014) ("*Order*"); Petition of the Wireless Communications Association, Int'l for Rulemaking, RM-11614, at 3-6 (filed Oct. 22, 2010).

Marlene H. Dortch

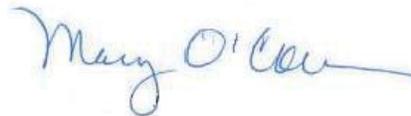
June 6, 2016

Page 2

to the  $43 + 10 \log (P)$  OOB limit.<sup>2</sup> Globalstar, in contrast, would loosen the OOB mask for all TLPS devices, whether fixed or mobile. We also emphasized that while the Commission loosened the internal BRS/EBS mask for BRS/EBS mobiles, the required OOB attenuation applicable at the 2496 MHz Mobile Satellite Service/BRS border remained  $43 + 10 \log (P)$ <sup>3</sup> in response to concerns that Globalstar had expressed about potential interference to it.<sup>4</sup> The willingness of BRS/EBS licensees to accept a less restrictive internal OOB mask was premised on the 2.5 GHz band operating environment, where adjacent channel use is typically synchronized Time Division Duplex (“TDD”). In other words, mobiles transmit during the same time frame, and thus there is no potential for OOB from one mobile to cause interference to a nearby mobile. The record in this docket establishes that use of synchronized TDD “mitigates the potential interference impact of relaxed OOB, but it is not possible to synchronize operations between BRS and TLPS.”<sup>5</sup> Thus, the coordination technique that makes a  $40 + 10 \log (P)$  OOB mask acceptable for intra-BRS/EBS purposes will not be present when TLPS and BRS1 operate on adjacent channels.

Pursuant to Sections 1.1206(b)(1) and 1.49(f) of the Commission’s Rules, this letter is being filed electronically with the Commission via the Electronic Comment Filing System. Should you have any questions regarding this presentation, please contact the undersigned.

Respectfully submitted,



Paul J. Sinderbrand

Mary N. O’Connor

Counsel to the Wireless Communications  
Association International

cc: Erin McGrath  
Johanna Thomas

---

<sup>2</sup> Compare 47 C.F.R. § 27.53(m)(4) (establishing mask for mobile devices) with 47 C.F.R. §§ 27.53(m)(2) and 27.53(m)(2)(v) (establishing base station and fixed user station masks).

<sup>3</sup> See 47 C.F.R. § 27.53(m)(4). See also *Order*, 29 FCC Rcd at 6338 ¶ 17.

<sup>4</sup> *Order*, 29 FCC Rcd at 6338 ¶ 17.

<sup>5</sup> Comments of Sprint Corp., IB Docket No. 13-213 & RM-11685, at 7 (filed May 5, 2014).