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October 24, 2007

Marlene H. Dortch
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: *Request by Globalstar, Inc. To Expand Its Ancillary Terrestrial Component Authority To Encompass Its Full Assigned Spectrum: RM-11339 – Written Ex Parte filing*

Dear Ms. Dortch:

KMW Communications wishes to advise the Federal Communications Commission of its unqualified opposition to the request by Globalstar, Inc. (Globalstar) for changes in the Commission's rules that would allow Globalstar to operate an Ancillary Terrestrial Component (ATC) system above 2493 MHz (in other words, without preserving the 3 MHz guardband that presently protects the Broadband Radio Service (BRS) from ATC operations). We have developed and are actively marketing a Filtered TTLNA (Tower Top Low Noise Amplifier) product that is used with WiMAX base stations. This product must sufficiently attenuate Globalstar's terrestrial signals to prevent severe overload to the TTLNA and associated serving base station, something it will not be able to do if the 3 MHz guardband is eliminated.

At present, Globalstar cannot operate its ATC system in the 2.4 GHz band except at 2487.5-2493 MHz. In restricting Globalstar's ATC operations to spectrum below 2493 MHz, the Commission established a 3 MHz guardband between ATC and BRS channel 1 at 2496-2502 MHz. Although this 3 MHz can be utilized for Globalstar's satellite services, it is imperative that the current rule precluding Globalstar from using spectrum above 2493 MHz for terrestrial base station transmissions be maintained. Were Globalstar's petition granted and Globalstar permitted to operate ATC base stations in the above 2493 MHz, then adjacent channel overload interference to BRS channel 1 will inevitably occur. At these microwave frequencies, 3 MHz of guard band is required at a minimum to achieve marginally sufficient attenuation even with the best of filter designs, to avoid overload interference while still being capable of sufficiently amplifying the extremely weak signals from mobile devices. The net result, then, is that adoption of the Globalstar proposal to use spectrum above 2493 MHz for base station transmissions will preclude the use of BRS channel 1 for WiMAX mobile services.

As required by Sections 1.49(f) and 1.1206(b) of the Commission's Rules, a copy of this letter is being filed electronically via the Commission's Electronic Comment Filing System for inclusion in the public record of the above-reference proceeding.

Should you have any questions regarding this submission, please feel free to contact me.

Respectfully submitted,

A handwritten signature in black ink that reads 'Burton J. Calloway'. The signature is written in a cursive, slightly slanted style.

Burton J. Calloway

cc: Aaron cc: Arron
Bruce Gottlieb
Renée Roland Crittendon
Wayne A. Leighton
Angela Giancarlo