

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Spectrum and Service Rules for Ancillary Terrestrial Components in the 1.6/2.4 GHz Big LEO Band	)	IB Docket No. 07-253
	)	
Request by Globalstar, Inc. To Expand Its Ancillary Terrestrial Component (“ATC”) Authority To Encompass Its Full Assigned Spectrum	)	RM-11339.
	)	
	)	

**REPLY COMMENTS OF MAIN STREET BROADBAND LLC**

Submitted January 3, 2007

Contacts:

Michael F. Mies  
**Main Street Broadband LLC**  
945 E. Paces Ferry Rd., NE  
Suite 2200  
Atlanta, GA 30326  
(404) 760-5343

Walter M. Zirkle  
**Main Street Broadband LLC**  
945 E. Paces Ferry Rd., NE  
Suite 2200  
Atlanta, GA 30326  
(434) 760-7600

Main Street Broadband LLC (“MSB”) submits these Reply Comments in response to the Commission’s Notice of Proposed Rulemaking (“*NPRM*”) proposing to revise the Commission’s rules to increase the amount of spectrum on which Globalstar, Inc. (“Globalstar”) is authorized to operate Ancillary Terrestrial Component (“ATC”) systems. **MSB believes that the public interest is served, and no other licensee’s interests are compromised, by the prompt expansion of ATC authority to all of Globalstar’s unshared spectrum resources.**

MSB believes that absent a) a public policy conflict or b) a technical impediment, the Commission should have no basis to deny Globalstar’s petition. No Commenters have identified any public policy conflict or valid technical justification for exclusion of all of Globalstar’s unshared spectrum in its ATC authority.

With respect to public policy, MSB’s initial comments make clear its position that the public interest is best served by the greatest availability of spectrum for the provision of essential services and advanced applications, particularly for unserved and underserved communities. This view is echoed in the comments of Globalstar and Open Range Communications, Inc. (“Open Range”). No Commenters have identified any public interest benefit or policy interest in not allowing Globalstar to expand its ATC authority to all of its unshared spectrum. Indeed, the stated United States policy interest of “universal broadband access” is absolutely contingent upon the availability of suitable spectrum and willing commercial enterprises, such as Globalstar, MSB and Open Range, to deploy services in rural communities.

In addition to the obvious public interest related to the provision of essential services in rural communities, it is also in the public interest for available spectrum to be

utilized in the most efficient and effective manner possible. This is well articulated in the comments of Nortel. The need for efficient utilization of all available spectrum will increase dramatically in coming years, as additional wireless broadband applications and services will rapidly drive the need for additional bandwidth. It is critical that licensees have the ability to use their spectrum resources as efficiently as possible to meet this growing demand for essential wireless services.

Regarding technical impediments, no Commenters have identified any valid technical justification for denying Globalstar's expanded ATC authority. Given that a) Globalstar has limited its request to expand its ATC authority to only its *unshared* spectrum resources, b) Globalstar also is not seeking authority to provide ATC services in the 1 MHz guard band between 2495-2496 MHz and c) Globalstar has indicated that its operations in the expanded spectrum will be subject to the existing requirements in the Commission's rules and in its ATC authorization designed to prevent harmful interference to other licensed operations, there can be no technical concern regarding interference with other licensees' operations.

With respect to the S-Band spectrum, the 1 MHz guard band is absolutely sufficient, if not unnecessary. MSB management has been involved in all technical aspects of the wireless industry since the inception of the cellular business in the early 1980s. Since that time, wireless service operators have operated adjacently with no guard band. Indeed, Nortel's comments suggest that guard bands should be used sparingly, if at all, in order to maximize spectrum efficiency. Operators have successfully used standard techniques such as receive filtering, transmit filtering, base station placement, and antenna tilt so that they can use all their spectrum without interfering with the adjacent

operator. In MSB's opinion, there is absolutely no technical reason why ATC and BRS licensees cannot use similar techniques to avoid interference even more easily given the 1 MHz guard band which does not exist between other MS licensees.

The objections raised by other Commenters relate to the possible provision of services in the shared spectrum between 2495-2500, while Globalstar has specifically not requested authority for ATC operations in this shared spectrum.

MSB again encourages the Commission to expeditiously complete this proceeding and approve the inclusion of all of Globalstar's unshared spectrum into its ATC authorization. It is imperative that licensees such as Globalstar have the ability to utilize their spectrum resources to the fullest extent possible, without interfering with other licensees, in order to deploy innovative, essential and cost-effective solutions to the millions of households and businesses that do not have competitive broadband availability.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Mies", written in a cursive style.

Michael F. Mies  
Chief Executive Officer  
Main Street Broadband LLC  
945 E. Paces Ferry Rd., NE  
Suite 2200  
Atlanta GA 30326