



L. Barbee Ponder IV

General Counsel & Vice President Regulatory Affairs

November 5, 2011

Via Electronic Filing

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

Submission of Written Material Communication

Re: **RE: 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: WT Docket No. 03-66, RM-11614**

Dear Ms. Dortch:

On behalf of Globalstar, Inc. ("Globalstar"), I write to respond to the October 19, 2012 letter and written materials filed by Clearwire Corporation ("Clearwire") in the above referenced proceeding.

Over the course of the last several months, representatives of Globalstar and Clearwire have met to resolve our respective differences in the above referenced proceeding, and I am pleased to report that Globalstar has no objection to Clearwire's recently proposed out-of-band emission (OOBE) limits for mobile digital stations in the 2.5 GHz band. See *Ex Parte* Letter from Cathy Massey, Clearwire Corporation, to Marlene Dortch, Secretary, FCC, WT Docket No. 03-66, RM-11614, at 1 (Oct. 19, 2012) ("*Clearwire Ex Parte*"). These OOBE limits are designed to accommodate the use of wider channel bandwidths in the 2.5 GHz band, as described in the *Clearwire Ex Parte* and in the Wireless Communications Association International's Petition for Rulemaking filed October 22, 2010.

Specifically, Globalstar has no objection to adoption of the following revised OOBE limits in the referenced proceeding: 40 + 10 log (P) dB at the channel edges, a 43 + 10 log (P) dB attenuation factor beyond 5 MHz from the channel edges, and a 55 + 10 log (P) dB attenuation factor at "X" MHz from the channel edges where "X" is the greater of 6 MHz and the actual channel bandwidth, except that the existing OOBE limits would be maintained at the lower band edge (below 2496 MHz) of the 2.5 GHz band.

The language of the agreed compromise is properly reflected on page 8 of the October 18, 2012 power point presentation that was included in the *Clearwire Ex Parte*. Further, Globalstar has no objection to WCAI's proposed allowance of a resolution bandwidth of 2 percent for mobile digital stations in section 27.53(m)(6).

Pursuant to Sections 1.1206(b)(2)(i) and 1.49(f) of the Commission's Rules, this notice is being filed electronically in the above-captioned proceedings. Naturally, if you have any questions, please do not hesitate to contact me at (985) 335-1503.

Sincerely,

A handwritten signature in black ink, appearing to be 'L. Barbee Ponder IV', written in a cursive style with a long horizontal line extending to the right.

L. Barbee Ponder IV
General Counsel & Vice President Regulatory Affairs