

LAWLER, METZGER, KEENEY & LOGAN, LLC

2001 K STREET, NW  
SUITE 802  
WASHINGTON, D.C. 20006

REGINA M. KEENEY

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

May 9, 2013

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

Re: *Globalstar, Inc. Petition for Rulemaking to Reform the Commission's Regulatory Framework for Terrestrial Use of the Big LEO MSS Band – RM-11685*  
*Ex Parte Notice*

Dear Ms. Dortch:

On Tuesday, May 7, 2013, L. Barbee Ponder IV, General Counsel & Vice President, Regulatory Affairs, for Globalstar, Inc. (“Globalstar”), spoke to Michael Steffen, Legal Advisor to Chairman Julius Genachowski, about Iridium’s Petition for Rulemaking asking the Commission to revisit the band plan in the Lower Big LEO band (1610-1626.5 MHz).<sup>1</sup> The Commission should reject this petition – it is, in effect, a very late-filed petition for reconsideration of a 2007 Commission rulemaking decision made after a four-year long proceeding. As Mr. Ponder described, Iridium’s request is an unsupported and competitively-driven attempt to capture almost three megahertz of Big LEO spectrum assigned to and used by Globalstar, which earlier this year completed the launch of its \$1 billion second-generation mobile satellite service constellation specifically designed for and currently operating over those three megahertz. The Commission has already examined and re-balanced the Big LEO band plan and there is no basis for revisiting those prior decisions now.<sup>2</sup>

Mr. Ponder also addressed the status of Globalstar’s November 2012 Petition for Rulemaking seeking reform of the Commission’s terrestrial-use rules and policies in the Big LEO band.<sup>3</sup> As the record in this proceeding demonstrates, Globalstar’s proposed Big LEO reforms will bring consumers the benefits of increased investment and innovation and more intensive use of broadband spectrum for a variety of broadband applications, including Globalstar’s proposed terrestrial low power service (“TLPS”). The deployment of TLPS will quickly add 22 megahertz to the nation’s wireless broadband spectrum inventory as American consumers utilize their smartphones, tablets, and other 802.11-enabled devices to receive this

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<sup>1</sup> Petition for Rulemaking of Iridium Constellation LLC (Feb. 11, 2013).

<sup>2</sup> See Opposition of Globalstar, Inc. to Motion to Consolidate, RM-11685 (Feb. 21, 2013).

<sup>3</sup> Petition for Rulemaking of Globalstar, Inc., RM-11685 (Nov. 13, 2012).

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service. In particular, Mr. Ponder pointed out that TLPS will further the Chairman's goal of easing the congestion that is diminishing the quality of Wi-Fi service at high-traffic 802.11 hotspots and other locations, a problem that the Chairman has termed the "Wi-Fi Traffic Jam." Mr. Ponder urged that the Commission move forward with a Notice of Proposed Rulemaking on Globalstar's proposed reforms prior to the Chairman's expected departure later this month.

Pursuant to section 1.1206(b) of the Commission's rules,<sup>4</sup> this *ex parte* notification is being filed electronically for inclusion in the public record of the above-referenced proceedings.

Respectfully submitted,

/s/ Regina M. Keeney  
Regina M. Keeney

cc: Michael Steffen

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<sup>4</sup> 47 C.F.R. § 1.1206(b).