Engineers for the Integrity of Broadcast Auxiliary Services Spectrum

ELECTRONICALLY FILED TO RM-11685

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June 26, 2013

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Dear Ms. Dortch:

EIBASS is submitting this response to the June 10, 2013, Globalstar letter to RM-11685, regarding testing results for 2,473–2,495 MHz Terrestrial Low Power Service (TLPS)/Advanced Wireless Service 5 (AWS-5). Globalstar has proposed these services to create a 22-MHz wide WiFi channel. The bottom 10.5 MHz would come from the 2,400-2,483.5 MHz Part 15 WiFi band. The top 11.5 MHz would come from the S-band Mobile Satellite Service allocation at 2,483.5–2,500 MHz (an "Anciliary Terrestrial Component," or ATC use). The TLPS portion would be co-channel with Part 74 TV Broadcast Auxiliary Service (BAS) Channel A9 at 2,467–2,483.5 MHz, and the AWS-5 portion would be co-channel with grandfathered TV BAS Channel A10 at 2,483.5-2,500 MHz.

Globalstar's partner, Jarvinian Wireless Innovation Fund ("Jarvinian"), obtained experimental licenses WG2XNK and WG2XNS for testing TLPS/AWS-5. WG2XNK was for testing at Cambridge, MA, in the metropolitan Boston area. WG2XNS was for testing at Cupertino and Sunnyvale, CA, in the "Silicon Valley" portion of the San Francisco Bay Area. Both experimental licenses had the "SBE Clause," requiring prior frequency coordination with local BAS frequency coordinators. In the Boston area the coordinator is Mr. Joseph Sweeny of Emerson College. In the San Francisco Bay Area that person is Mr. Don Sharp, the above-1 GHz coordinator for the Northern California Frequency Coordinating Committee (NCFCC).

Station WCVB-TV, D20 (V05), Boston, is also licensee of TV Pickup Station KR9882, which has TV BAS Channel A10 grandfather rights. Station KPIX-TV, D29 (V05), San Francisco, is also licensee of TV Pickup Station KA35181, similarly having TV BAS Channel A10 grandfather rights. Grandfathered A10 stations are co-primary (not secondary) with S-band MSS, and there is no sunset date to those grandfather rights. Both stations are additionally authorized for TV BAS Channels A8 (2,450-2,467 MHz) and A9. Both WCVB-TV and KPIX-TV use their TV Pickup stations in support of extensive electronic news gathering (ENG) operations.

Upon learning of the WG2XNK and WG2XNS experimental license grants, EIBASS contacted Mr. John Dooley of Jarvinian. That contact resulted in successful frequency coordination with NCFCC for WG2XNS (San Francisco), but not for WG2XNK (Boston). The WG2XNS frequency coordination was based on Jarvinian's agreement to test at no more than 26 dBm EIRP (*i.e.,* 12 dB less power than authorized by the WG2XNS license), confine the testing to indoor venues only, and limit the number of transmitters to no more than ten. Jarvinian also agreed to provide a "stop buzzer" hot-line telephone number staffed during the testing, and to advise NCFCC prior to the commencement the testing. Mr. Dooley was cautioned that KPIX-TV was actively using A10 in the South Bay, and that this use included operations from a blimp covering the San Jose Sharks National Hockey League playoff games. Since the KPIX-TV KA35181

operation permitted EIRPs of up to 65 dBm, Jarvinian was warned that it might receive interference. However, since experimental operations are secondary, Jarvinian would have to accept any such interference, while not, in turn, causing interference to the KPIX-TV ENG operations. Based on reports from Mr. Sharp of NCFCC, Jarvinian complied with these conditions, advising that the WG2XNS testing commenced on April 26, 2013, and ended on May 9, 2013.

The WG2XNK situation is more difficult. There was a meeting at WCVB-TV on June 6, 2013, with Mr. Dooley and Mr. Sweeny, plus other WCVB-TV personnel, to demonstrate how broadcasters use their 2 and 2.5 GHz frequencies for ENG to support their on-air television programming requirements. A follow-up meeting was to happen on the week of June 17–21, again at WCVB-TV, to review the locations of Boston-area ENG-RO sites and establish a testing schedule for WG2XNK. However, EIBASS has been advised that despite multiple attempts to schedule that meeting, it has not yet occured. Thus, Jarvinian has not yet complied with the Special Condition 4 requirement on the WG2XNK experimental license (the SBE frequency coordination clause).

Accordingly, the June 10 filing by Globalstar, reporting successful testing results of TLPS/AWS-5 in Cambridge, came as a great surprise to EIBASS, to Mr. Sweeney, and to WCVB-TV. Since the required frequency coordination had not yet been completed, EIBASS has to ask by what authority did Jarvinian/Globalstar conduct its tests in apparent violation of the requirement of WG2XNK Special Condition 4?

A corollary question is what were the results of the WG2XNS Cupertino/Sunnyvale tests? EIBASS wonders if those results were not mentioned because they were unsuccessful, possibly due to interference from the KPIX-TV A10 operations. If so, this only re-enforces what EIBASS has been telling Globalstar for the last several years, namely that S-band MSS ATC and grandfathered A10 ENG in the same area at the same time are mutually exclusive uses. Alternatively, if the Cupertino/Sunnyvale tests were successful, this would be evidence that reduced-power TLPS/AWS-5 still provided acceptable coverage.

Respectfully,

/s/ Dane E. Ericksen ***/s/ Richard A. Rudman***

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