JARVINIAN

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July 1, 2013

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

Re: Globalstar, Inc. Petition for Rulemaking
RM-11685

Dear Ms. Dortch:

I write in response to, and to correct, the factually incorrect statements and assertions made by the Engineers for the Integrity of Broadcast Auxiliary Services Spectrum (EIBASS), an advocacy group that purports to represent all BAS interests, in its June 26th Ex Parte filing.

Testing in Cambridge, MA:

On March 25, 2013, Jarvinian Wireless Innovation Fund was granted experimental license WG2XNK. A condition of this experimental authorization was that Jarvinian coordinate testing with BAS license holders. Jarvinian did so, agreeing to a conservative set of power limitations and continuously manned stop buzzer protection.

The EIBASS letter correctly states that I attended a meeting on June 6, 2013 with Joseph Sweeney of Emerson College and David Beauvais of WCVB-TV. Mr. Sweeny and Mr. Beauvais were extremely helpful, giving me a comprehensive overview of BAS, even allowing me to observe actual BAS operation and to examine BAS equipment in detail. I greatly appreciate the knowledge, professionalism, and hospitality shown by Mr. Sweeney and Mr. Beauvais.

At the close of the June 6th meeting, basic plans were made to follow up with a test designed to measure the potential impact of Terrestrial Low Power Service (TLPS) operation on BAS. I proposed a test location near the Massachusetts State House, due largely to the frequent use of BAS for live coverage of news events in that area. Mr. Sweeney and I then conceptualized a high power rooftop test, which would simulate a worst-case scenario. This would help determine if TLPS operations would be detectable by BAS remote pickup stations and/or if TLPS

would have any detrimental impact on BAS link quality. Jarvinian then began immediately assembling the necessary equipment and other resources to conduct the test.

The EIBASS letter incorrectly implies that Jarvinian has failed to follow up with local broadcast interests. In fact, I have placed myself at the disposal of Mr. Sweeney and Mr. Beauvais. As soon as their schedules permit, Jarvinian will support this and other testing necessary to ensure that BAS interests are protected.

Most troubling, the EIBASS letter incorrectly states that Jarvinian conducted testing in violation of its experimental license. In fact, I conducted this testing in an indoor environment after properly coordinating with Mr. Sweeney, and the tests very comfortably met all of the agreed upon conditions of power level and stop buzzer protection. I am unaware of any interference caused to BAS operations during this testing and no one has notified me of any such instances.

Testing in Cupertino and Mountain View, CA:

On April 1, 2013, Jarvinian Wireless Innovation Fund was granted experimental license WG2XNS for three locations in the San Francisco Bay Area. Like Cambridge, a condition of this authorization was that Jarvinian coordinate testing with BAS license holders. Also like Cambridge, Jarvinian agreed to a conservative set of power limitations and continuously manned stop buzzer protection.

The purpose of testing in this environment is to help a major technology company assess the significant performance benefits of TLPS for a transformative consumer broadband application. The EIBASS letter incorrectly implies that a lack of test result publication from this environment is due to interference from BAS operations in the Bay Area. This is not true. There have been no reports of BAS interference to TLPS in any test environment. In fact, across thousands of hours of passive spectral analysis in dozens of domestic markets, Jarvinian has never detected BAS transmissions on Channel A10. Those skilled in the art will realize that BAS transmissions are generally too intermittent and directional in nature to meaningfully impact applications like TLPS.

Globalstar's proposed Terrestrial Low Power Service (TLPS) represents a means of rapidly adding critical bandwidth to America's wireless inventory. Most importantly, the technical nature of TLPS is ideally suited not only to effectively push much needed data capacity to wireless users, but also to co-exist with grandfathered BAS services. We greatly appreciate the help of BAS representatives like Mr. Sweeney and Mr. Beauvais in facilitating our testing of TLPS.

When BAS was established 50 years ago, it helped enable a new era of live television news and entertainment. Today, even with increasingly ubiquitous mobile broadband access, the ability of local television broadcasters to independently transmit remote audio and video is critical to

their function. Jarvinian remains committed to working with broadcasters to ensure that TLPS and other aspects of the AWS-5 petition do not have a deleterious impact on grandfathered BAS Channel A10 operations.

Sincerely,

/s/ John Dooley

John Dooley
Managing Director
Jarvinian Wireless Innovation Fund