

Mignon Clyburn,
Chairwoman,
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

Dear Chairwoman Clyburn,

After review of the Globalstar petition and discussion with Globalstar, the Bluetooth Special Interest Group ("Bluetooth") would like to supplement its previous comments (filed January 14th 2013 on this matter) and object to the Petition for Rulemaking on the grounds that the Globalstar proposal would have an adverse effect on the users of more than 2 Billion Bluetooth devices in the USA.

Globalstar in their proposal emphasize the Wi-Fi "traffic jam" occurring in the 2.4GHz ISM band, but their proposal in no way considers Bluetooth devices and Bluetooth users who also have to use this spectrum as well. Bluetooth believes that Globalstar's proposal would create more congestion and negatively affect the quality of users Bluetooth product usage adding to the Bluetooth "traffic jam".

Today in the 2400-2483.5MHz ISM band Wi-Fi is defined to use frequencies from 2401-2473MHz. Bluetooth agrees that Wi-Fi use is growing and the use of frequencies in that range by Wi-Fi and other technologies often experience congestion. Those frequencies not used by Wi-Fi in the USA (2473-2483.5MHz) are somewhat of a "safe haven" to technologies such as Bluetooth and can be helpful when techniques such as adaptive frequency hopping are used which can avoid the congestion and operate with better quality of service in a less congested portions of the frequency band. Globalstar's proposal would create significant congestion in this "safe haven" part of the frequency band (2473-2483.5MHz), not alleviate it and Bluetooth users experience would suffer.

You may also be aware of the recent innovation in Bluetooth, where the technology has been enhanced creating a Low Power mode (known as Bluetooth Smart or Bluetooth Low Energy) which is now powering a growing number of very small consumer products such as those in the rapidly growing Health and Wellness sector, products like Heart Rate, Blood Glucose and Blood Pressure monitors. These products will help save lives and lower healthcare costs. The Globalstar proposal (if allowed) could affect use of what amounts to 10% of the ISM band, which translates to 8/79 "Classic" Bluetooth channels or 4/39 Low Energy Bluetooth channels. One of the 4 Low Energy Bluetooth channels affected is one of only 3 "advertising" channels, channels which are exclusively used when Bluetooth devices discover and connect with one another, so the Globalstar proposal could have an even greater impact than just reducing the available channels and adding to congestion.

We and our members do not agree with several important technical claims made by Globalstar in their proposal, particularly the hypothesis that their "controlled" or "managed" use of Channel 14 would have a limited if not small impact on other users of the spectrum. Bluetooth and its members own preliminary

analysis would draw a different and contrary conclusion. Bluetooth therefore believes that it is premature to proceed with the Rulemaking until sufficient information and analysis has been completed.

Globalstar has offered to provide technical briefings to our more knowledgeable and technically capable members and to participate in joint technical studies in order to prove their point. So we would respectfully suggest that perhaps a Notice of Inquiry would be an appropriate next step so that these technical matters can be fully understood.

Bluetooth agrees that congestion and spectrum availability is a serious concern, but we do not agree that a solution lies in adding to the congestion problem. In order to ensure that the over 2 Billion Users of Bluetooth products (and growing rapidly) including those in Schools, Libraries, Healthcare and Emergency response, do not experience a substantial degradation in quality of service we therefore urge the Commission NOT to move forwards with a Notice of Proposed Rulemaking on Big LEO until a full technical analysis of the impacts has been completed and the impact on the existing users of the spectrum understood.

We would be available to meet with you and your team at the FCC to provide more analysis and details as needed.

Respectfully submitted,



Mark Powell

Executive Director

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