

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
Terrestrial Use of the 2473–2495 MHz Band for)	IB Docket No. 13-213
Low-Power Mobile Broadband Networks;)	RM-11685
Amendments to Rules for the Ancilliary Terrestrial)	
Component of Mobile Satellite Service Systems)	
)	
Amendment of Parts 1, 21, 73, 74 and 101)	
Commission's Rules to Facilitate the Provision of)	WT Docket 03-66
Fixed and Mobile Broadband Access, Educational)	
and Other Advance Services in the 2150–2162)	
and 2500–2690 MHz Bands)	

To: The Commission

EIBASS Response To the Globalstar December 13, 2013, Ex Parte Filing

1. Engineers for the Integrity of Broadcast Auxiliary Services Spectrum (EIBASS) hereby respectfully submits its early docket comments in response to the December 13, 2013, *ex parte* filing of Globalstar to IB Docket 13-213/RM-11685. The Commission released a Notice of Proposed Rulemaking (NPRM) on November 1, 2013, with a comment deadline of 75 days after publication in the Federal Register. To the best of EIBASS’ knowledge, that publication has not yet occurred, but EIBASS is filing these early comments so that the Electronic Comment Filing System (ECFS) will show that the Globalstar slide 22 omitted critical information about TV Broadcast Auxiliary Service (BAS) use of the spectrum being discussed in the Globalstar filing.¹

I. Slide 22 Omits Co-channel TV BAS Spectrum

2. Globalstar slide 22 labels 2,483.5–2,500 MHz as “GSAT” (for Globalstar satellite, apparently) from 2,483.5-2,495 MHz, 2,495–2,496 MHz as “1 MHz guard band,” and 2,496–2,500 MHz as “4 MHz of co-primary BRS spectrum (predominantly Clearwire).” Further, 2,155–2,483.5 MHz, is labeled “Wi-Fi and others.” EIBASS wants the docket record to accurately reflect co-primary use at 2,483.5–2,495 MHz for indefinitely grandfathered TV BAS Channel A10 operations. Further, TV BAS Channels A8 (2,450–2,467 MHz) and A9 (2,467–2,483.5 MHz) are among the “and others” as Globalstar puts it in its not-to-scale “2,155–2,483.5

¹ The Globalstar December 13, 2013, *ex parte* filing consists of a two-page letter and 31 unnumbered slides. Those slides have been sequentially numbered 1 through 31 for reference purposes for this EIBASS filing.

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MHz” block. TV BAS Channel A8 and Channel A9 stations are licensed, Part 74, Subpart F, users that are primary, versus Wi-Fi, which a secondary, Part 15, unlicensed use.

3. EIBASS has therefore created a modified, and more accurate, version of Globalstar slide 22, which is attached as Figure 1.

4. Grandfathered TV BAS Channel A10 also has co-channel overlap with Broadband Radio Service (BRS) Channel 1, at 2,496–2,502 MHz. EIBASS notes that this co-channel overlap is a still-pending, unresolved issue in the WT Docket 03-66 proceeding.

II. Summary

5. Once again Globalstar has wittingly or unwittingly ignored in a filing before the Commission a licensed, co-channel, co-primary service that it is obligated to protect. EIBASS files to correct the record.

III. List of Figures

6. The following figures have been prepared as a part of these IB Docket 13-213 comments:
1. More accurate version of Globalstar slide 22.
 2. Excerpts from FCC rules documenting the 2.5 GHz TV BAS Channel A10 allocation.

Respectfully submitted,

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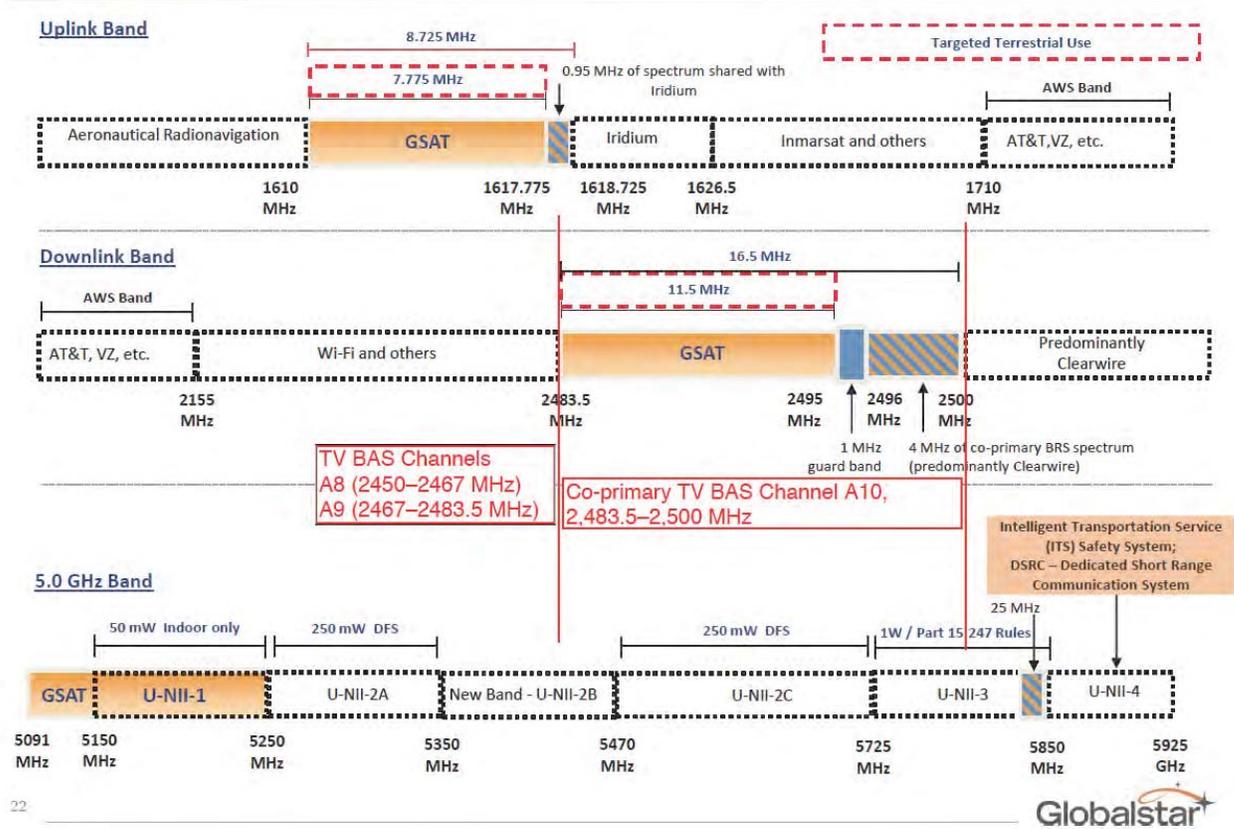
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More Accurate Version of Globalstar Slide 22

from Globalstar 12-13-2013 ex parte filing to IB Docket 13-213

GLOBALSTAR'S U.S.-LICENSED SPECTRUM



**EIBASS Early Comments To IB Docket 13-213,
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Documentation Showing 2.5 GHz TV BAS Spectrum Allocation

Excerpt from 47 CFR Section 2.106 (Table of Frequency Allotments):

NG147 In the band 2483.5-2500 MHz, non-Federal stations in the fixed and mobile services that are licensed under 47 CFR parts 74, 90, or 101, which were licensed as of July 25, 1985, and those whose initial applications were filed on or before July 25, 1985, may continue to operate on a primary basis with the mobile-satellite and radiodetermination-satellite services, and in the sub-band 2495-2500 MHz, these grandfathered stations may also continue to operate on a primary basis with stations in the fixed and mobile except aeronautical mobile services that are licensed under 47 CFR part 27.

ELECTRONIC CODE OF FEDERAL REGULATIONS

e-CFR Data is current as of December 12, 2013

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Title 47: Telecommunication

PART 74—EXPERIMENTAL RADIO, AUXILIARY, SPECIAL BROADCAST AND OTHER PROGRAM DISTRIBUTIONAL SERVICES

Subpart F—Television Broadcast Auxiliary Stations

§74.602 Frequency assignment.

excerpt from 47 CFR Section 74.602(a)(2):

(2) In the band 2483.5-2500 MHz, no applications for new stations or modification to existing stations to increase the number of transmitters will be accepted. Existing licensees as of July 25, 1985, and licensees whose initial applications were filed on or before July 25, 1985, are grandfathered and their operations are on a co-primary basis with the mobile-satellite and radiodetermination-satellite services, and in the segment 2495-2500 MHz, their operations are also on a co-primary basis with part 27 fixed and mobile except aeronautical mobile service operations.