

satellite system cannot store the geographic coordinates of 5 fixed uplink stations? And cannot be adjusted remotely to do so? To put it mildly, this strains credulity.

Even if we accept this rather far-fetched tale of technical incompetence wherein a satellite system launched in February 2013 is at once both the most sophisticated satellite communications system in the world but cannot store five fixed geographic coordinates from one orbital pass to the next, that is still not enough to create substantial interference. To achieve sufficient interference to “blind” its satellite from finding these five fixed terrestrial coordinates, Globalstar also assumes a wide scale deployment with no signal attenuation for buildings, trees, or atmospheric conditions. Given the well known signal attenuation problems for high frequency spectrum, notably its poor penetration and propagation characteristics (compared to low-band spectrum), this assumption is simply not tenable. Globalstar appears to contemplate a world in which every building, lamppost, tree limb and mountaintop is festooned with UNII-1 transmitters operating at full power with high-gain antennas pointing straight up.

Yet even if one, like the Red Queen, chooses to believe such impossible things before breakfast, the solution to Globalstar’s concern is relatively simple. In the event Globalstar’s dire predictions of an increase in the noise floor sufficient to “blind” its satellite system comes to pass, the Commission can permit Globalstar a sufficient increase in uplink power to attract the attention of it’s idiot-savant satellite system.

In no event should the Commission even contemplate rewarding Globalstar for its obstructionism by complying with its-not-so-subtle suggestion that the Commission instead should “rapidly and dramatically relieve existing congestion on public Wi-Fi channels, the ‘Wi-Fi Traffic Jam,’ through a carrier-grade, carrier-managed service” which, coincidentally, Globalstar has applied to operate. It is bad enough that Globalstar has demanded billions of dollars in free spectrum rights without a single concession to compensate the public for this windfall. To then attempt to hold this proceeding hostage with bogus interference claim demonstrates, as befitting a satellite communications provide, truly stellar *chutzpah*.

More importantly, Globalstar’s anticompetitive and disingenuous behavior in the UNII-1 proceeding casts grave concerns on its willingness to be a “good neighbor” to unlicensed operations in the 2.4 GHz band. If granted protected license status for terrestrial use in the 2473-2495 band, will Globalstar make similar baseless interference claims against free WiFi to drive customers to its pricier “carrier-grade, carrier-managed service?”

Given the vital importance of the 2.4 GHz band to unlicensed operations, which generates untold billions of economic productivity to the country, the Commission should not take the risk. Globalstar’s willingness to use bogus interference claims to commercially advantage itself as against competing unlicensed services in UNII-1 utterly undermines its glib assurances that its proposed Terrestrial Low Power Service (TLPS) will have no impact on the multi-billion dollar unlicensed market.

Concern for FAA Weather Radar. PISC also discussed concern that high-gain antennas could potentially interfere with FAA weather radar stationed in some 40 locations in the country. PISC

recognized that some systems authorized for use in the 5.8 GHz band have been illegally altered to work on the same band (or in proximity to) FAA weather radar, and that it would serve the public interest to consider how stricter device certification rules can prevent such alteration for future equipment operating on 5 GHz.

PISC observed that (a) the alterations are only useful for fixed, high power devices operating with high-gain antennas; and (b) the locations of all FAA weather radar is fixed and known. PISC proposed a “tattler” system. When fixed devices operate at the highest power levels, they should automatically report back their location to the TVWS database. In the event of interference with a weather radar installation, the impacted system operator could immediately query the database and locate the source of the interference. Operators would be warned in advance in the Report and Order that any interference with a weather station caused by an illegally altered device will result in the maximum fine permitted by law.

Docket No. 12-268 (Incentive Auction)

PISC reiterated the benefits of unlicensed access to the TV White Space spectrum. PISC also reported that at an event held by Microsoft the day before, industry representatives had talked about the readiness of industry to produce equipment operating under TVWS rules and the growing interest in developing TVWS internationally. These panelists stressed that the chief barrier to development and deployment in the United States, particularly with respect to rapid development and deployment of the 802.11af standard for personal/portable TV band devices, remained the uncertainty for the future of the band caused by the Incentive Auction.

Docket No. 12-354 (Operation in 3.5 GHz)

PISC expressed concern that fixed satellite service (FSS) incumbents operating in the C-Band spectrum above 3700 MHz could delay and impede the tremendous public interest benefits of the Commission’s proposed Citizens’ Broadband Service across the entire 3550-3700 MHz band by continuing to press unfounded claims about potential harmful interference to satellite earth stations, claims that the Commission effectively rejected in adopting the “light licensing” rules that currently allow operations by WISPs and other terrestrial wireless providers on 3650-3700 MHz under the Commission’s Part 90, Subpart Z rules. PISC asked staff if there was any serious concern that the small cell operations envisioned by the Commission’s proposed Citizens’ Broadband Service, which PISC generally supports, would create harmful interference that the C Band incumbents could not remedy at a reasonable cost, such as by installing very low-cost filters that would be good engineering practice whether or not the Commission authorized new, more efficient small cell deployments in the adjacent band below 3.7 GHz. The PISC representatives expressed support for establishing the sort of “harm claims threshold” that receivers must tolerate, along the lines recommended recently by the FCC’s Technical Advisory Committee (TAC).

In accordance with the FCC's *ex parte* rules, this document is being electronically filed in the above-referenced dockets today.

Sincerely,

_____/s/_____
Harold Feld
Senior V.P.
Public Knowledge

CC: John Leibovitz
Tom Peters