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July 17, 2014

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

Re: *Ex Parte* Notice: *Terrestrial Use of the 2473-2495 MHz Band for Low-Power Mobile Broadband Networks* – IB Docket No. 13-213; *Iridium Constellation LLC Petition for Rulemaking* – RM-11697

Dear Ms. Dortch:

On July 15, 2014, L. Barbee Ponder IV, General Counsel & Vice President, Regulatory Affairs, for Globalstar, Inc. (“Globalstar”), Steve Berman of Lawler, Metzger, Keeney & Logan, LLC, and I had separate meetings with Diane Cornell, Special Counsel to Chairman Tom Wheeler, Renee Gregory, Legal Advisor to Chairman Wheeler, and Jeffrey Shaw from Chairman Wheeler’s office; Brendan Carr, Legal Advisor to Commissioner Ajit Pai; and Erin McGrath, Legal Advisor to Commissioner Michael O’Rielly. At these meetings, we expressed support for the Commission’s November 2013 proposal to allow Globalstar to provide low-power terrestrial mobile broadband service in its own licensed spectrum at 2483.5-2495 MHz and adjacent, unlicensed spectrum at 2473-2483.5 MHz.¹ Adoption of this proposal would quickly add 22 megahertz to the nation’s wireless broadband spectrum inventory and ease the congestion that is diminishing the quality of Wi-Fi service at high-traffic 802.11 hotspots and other locations. With the comment cycle now complete, we urged the Commission to move forward expeditiously with an order in this proceeding.

In addition, we expressed Globalstar’s opposition to Iridium’s latest effort to appropriate a portion of Globalstar’s MSS spectrum in the Lower Big LEO band, where Globalstar is licensed to operate at 1610-1618.725 MHz.² In its “revised” proposal, Iridium presents no

¹ *Terrestrial Use of the 2473-2495 MHz Band for Low-Power Mobile Broadband Networks; Amendments to Rules for the Ancillary Terrestrial Component of Mobile Satellite Service Systems*, Notice of Proposed Rulemaking, 28 FCC Rcd 15351 (2013).

² *See* Petition for Rulemaking of Iridium Constellation LLC (Feb. 11, 2013); Supplemental Comments of Iridium Constellation, RM-11697 (May 5, 2014); Opposition of Globalstar, Inc. to Petition for Rulemaking, RM-11697 (Dec. 2, 2013).

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justification for revisiting the Commission's 2007 decision – adopted after a four-year long proceeding – allocating the Lower Big LEO band between Iridium and Globalstar. Since that 2007 decision, Globalstar has launched a \$1 billion, second-generation MSS constellation specifically designed for and is operating over the spectrum that Iridium now attempts to grab. Iridium seeks the very frequencies that Globalstar's customers rely upon every day to request life-saving rescues around the world. Over 3,000 rescues have been initiated by customers using Globalstar's SPOT products and services since 2007. The Commission should summarily reject Iridium's attempt to use the Commission's regulatory process to stifle its main competitor.

Pursuant to section 1.1206(b)(2) of the Commission's rules, 47 C.F.R. § 1.1206(b)(2), this *ex parte* notification is being filed electronically for inclusion in the public record of the above-referenced proceeding.

Respectfully submitted,

/s/ Regina M. Keeney
Regina M. Keeney

cc: Brendan Carr
Diane Cornell
Renee Gregory
Erin McGrath
Jeffrey Shaw