

LAWLER, METZGER, KEENEY & LOGAN, LLC

2001 K STREET, NW  
SUITE 802  
WASHINGTON, D.C. 20006

REGINA M. KEENEY

PHONE (202) 777-7700  
FACSIMILE (202) 777-7763

January 15, 2016

*Via Electronic Filing*

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

Dear Ms. Dortch:

On January 14, 2016, L. Barbee Ponder IV, General Counsel & Vice President, Regulatory Affairs, for Globalstar, Inc. (“Globalstar”), Steve Berman of Lawler, Metzger, Keeney & Logan, LLC, and I met with Mindel De La Torre, Chief of the International Bureau; Julius Knapp, Chief of the Office of Engineering and Technology; Edward “Smitty” Smith, Legal Advisor to Chairman Tom Wheeler; Troy Tanner, Deputy Chief of the International Bureau; Jose Albuquerque, Chief of the International Bureau’s Satellite Division; and Mark Settle, Chief of the Office of Engineering and Technology’s Policy and Rules Division, regarding the Commission’s proposed rules in the above-captioned proceeding.<sup>1</sup>

In this meeting, we discussed the public interest benefits of the rules the Commission proposed in 2013 and urged the Commission to adopt the rules without further delay. The Commission’s proposal to permit Globalstar’s Terrestrial Low Power Service (“TLPS”) will relieve significant wireless congestion and increase broadband capacity quickly while protecting and enhancing existing Wi-Fi services in the 2.4 GHz band. TLPS will improve wireless broadband access in the 2.4 GHz band for consumers by spreading the traffic in the band over four, rather than three, non-overlapping IEEE 802.11 channels. The benefits of TLPS will be particularly important in America’s schools and libraries because they are high-density environments with substantial and growing wireless broadband usage. Globalstar has committed to provide up to 20,000 free TLPS access points to public and non-profit schools, libraries, community colleges, and hospitals. Globalstar has repeatedly demonstrated the substantial

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<sup>1</sup> *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).

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consumer benefits of TLPS as well as the compatibility of TLPS with other wireless operations, including in a demonstration at the Commission's Technology Experience Center and in real-world deployments on a Chicago, Illinois university campus and at the all-scholarship Washington School for Girls in Anacostia.

At our meeting, we also discussed Globalstar's commitment to employ interference detection and mitigation techniques as part of any commercial TLPS offering. TLPS will be a managed service with networked access points controlled through a carrier-grade network operating system ("NOS") analogous to the systems used to manage pico- and femto-cellular infrastructure. Globalstar's NOS will provide a rapid-response platform for operators of licensed and unlicensed services to provide notice of any claimed interference to their services, and mitigation of harmful interference in the highly unlikely event that it occurs.

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: Mindel De La Torre  
Julius Knapp  
Edward "Smitty" Smith  
Troy Tanner  
Jose Albuquerque  
Mark Settle