



**January 15, 2013**

**GLOBALSTAR'S INITIAL RESPONSE TO COMMENTS ON ITS  
PETITION FOR RULEMAKING**

Globalstar appreciates the interest and participation of those companies and organizations that commented on our petition for rulemaking. Indeed, Globalstar requested a rulemaking in order to ensure an open and transparent proceeding in which all such issues can be addressed.

In its January 29<sup>th</sup> reply comments, Globalstar will respond to the issues raised in the initial comments and discuss its Terrestrial Low Power Service ("TLPS") opportunity in the FierceWireless hosted Webinar, "Globalstar's New "Wi-Fi" Super Highway, on Tuesday, January 22<sup>nd</sup>. We are issuing this statement *now* to immediately dispel certain misconceptions regarding our TLPS proposal that appeared in some of the filed comments.

With only a couple of exceptions, the commenters do not object to the Federal Communications Commission initiating a rulemaking proceeding to provide near term relief with respect to Globalstar's terrestrial authority. Most of the commenters did request that the Commission address specific concerns regarding the commercial roll-out of TLP. We address these concerns individually below.

**Wi-Fi Alliance and Bluetooth Special Interest Group concerns.** We look forward to working with the Wi-Fi Alliance and the Bluetooth Special Interest Group to address their concerns and assure their vast memberships that Globalstar:

- is *not* requesting exclusive authority to operate in that portion of the ISM band at 2473 – 2483.5 MHz
- has *not* requested that this spectrum be "licensed" to Globalstar
- has *not* requested that it receive interference protection from unlicensed use in Channel 11, and
- does *not* seek to displace any current or future unlicensed use in that part of the ISM band.

Globalstar's TLPS plans do not require that any modifications be made to existing or future Wi-Fi devices operating on Channels 1, 6 or 11.

Globalstar is not requesting that Bluetooth use within the 10.5 MHz of unlicensed ISM spectrum be discontinued or in any way affected as is claimed by the SIG. We made clear in our petition that "TLPS would co-exist with existing Bluetooth and other unlicensed uses of ISM spectrum without raising any harmful interference issues." (Petition at footnote 24.)

**Association of Home Appliance Manufacturers comments.** Globalstar also clarifies that its TLPS at 2473-2483.5 MHz will have to accept harmful interference from microwave ovens and other ISM devices, just like any other party using the unlicensed ISM band.

**Clearwire and Iridium concerns.** These entities argue that Globalstar should provide more technical information about its proposed services. While Globalstar believes that it has provided sufficient technical data for the FCC to move forward now with a proceeding, we fully anticipate providing additional technical analysis in the Commission's open, transparent rulemaking process. Certainly, Globalstar is committed to implementing terrestrial services without causing harmful interference to other licensed services.

Globalstar's competitor, Iridium, admits the benefits of Globalstar's TLPS plans, but steadfastly urges the Commission to keep the failed ATC regime in place for Globalstar in the Big LEO band. As the Commission has recognized, the existing ATC regime has not produced any of the intended public benefits. Despite the protests of Globalstar's competitor, we continue to urge the Commission to grant flexibility in the Big LEO Band, for the same reasons it eliminated the failed ATC regime in the 2 GHz band.

Globalstar looks forward to the Commission acting expeditiously so that Globalstar may do its part to help solve the "Wi-Fi Traffic Jam" that the Chairman has recently made a near-term priority. We believe that the filed comments should not cause any delay in Commission action.

**About Globalstar, Inc.**

Globalstar is a leading provider of mobile satellite voice and data services. Globalstar offers these services to commercial and recreational users in more than 120 countries around the world. The Company's products include mobile and fixed satellite telephones, simplex and duplex satellite data modems and flexible service packages. Many land based and maritime industries benefit from Globalstar with increased productivity from remote areas beyond cellular and landline service. Global customer segments include: oil and gas, government, mining, forestry, commercial fishing, utilities, military, transportation, heavy construction, emergency preparedness, and business continuity as well as individual recreational users. Globalstar data solutions are ideal for various asset and personal tracking, data monitoring and SCADA applications. Note that all SPOT products described in this or any Globalstar press release are the products of Spot LLC, which is not affiliated in any manner with Spot Image of Toulouse, France or Spot Image Corporation of Chantilly, Virginia. SPOT Connect is a trademark of Spot LLC.

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