



November 7, 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

Dear Ms. Dortch:

I write on behalf of Ruckus Wireless in support of the Federal Communications Commission's ("FCC's") November 2013 proposal to allow Globalstar to provide low power terrestrial broadband services over its licensed spectrum at 2483.5-2495 MHz and adjacent, unlicensed ISM spectrum at 2473-2483.5 MHz.¹

Ruckus Wireless is a pioneer in the wireless infrastructure market, enabling carriers and enterprises to stay ahead of the exploding demand for high-bandwidth applications and services. Since our founding in 2004, Ruckus has led the industry in performance innovation, never relying on off-the-shelf, reference design radio technology that doesn't deliver the capacity, range or interference mitigation necessary to make the dream of high performance wireless a reality.

In order for this performance innovation to continue and to meet the exploding demand for mobile data applications and services, every megahertz is important, but all megahertz are not created equal. Ruckus urges the FCC to move forward to free up additional low, mid and upper band spectrum. While the FCC's ongoing efforts to open up the 5 GHz band to greater unlicensed use is critical to this effort, the 2.4 GHz band will remain an important source of unlicensed spectrum due to its superior propagation characteristics. Given the well-documented fact that existing 2.4 GHz unlicensed spectrum is becoming saturated with use in an ever increasing portion of the nation, the FCC's proposed rules in the above referenced proceeding will provide a much needed significant increase in available mid-band spectrum.

The FCC, along with the entire wireless communications industry, is well aware of how long it normally takes to free up additional spectrum for new wireless services. That is why opportunities like the one that the FCC identified in the above referenced proceeding are so important. Ruckus urges the FCC to adopt its proposed rules in this proceeding expeditiously.

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).

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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,

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