

Public Interest Group Filing Is Good for Globalstar

WRG Telecom/ Media November 23, 2015

Paul Gallant | 202-747-9454 | paul.gallant@guggenheimpartners.com

Summary:

- On Friday, Public Knowledge submitted an FCC filing that generally supports **Globalstar's** proposal.
- We think the letter materially improves the chances of FCC granting approval.

On Friday, Public Knowledge submitted a letter to the FCC on Globalstar and LTE-U. Here is what it said and what we think it means for Globalstar --

MESSAGE TO FCC. On Globalstar, Public Knowledge's letter had two key points: **1)** Globalstar's proposed service would improve Wifi speeds and throughput for all users of 2.4 Ghz hotspots, so the FCC would be justified in granting Globalstar's plan of exclusive access to a currently unused channel; **2)** However, Globalstar's TLPS has only been tested indoors, so the FCC should consider requiring outdoor testing as well before approving Globalstar's plan.

MATERIAL POSITIVE FOR GLOBALSTAR. We believe the supportive letter from Public Knowledge materially improves the chances of Globalstar winning FCC approval for its TLPS proposal. FCC and congressional Democrats pay close attention to PK's views. And in the face of opposition from **Google**, **Microsoft**, cable, and others, we think PK's letter provides important political cover for the FCC to approve Globalstar's petition. We say this because FCC and congressional Democrats pay close attention to PK's views, but also because (in our view) of the letter's careful and evenhanded analysis of Globalstar's proposal. PK's letter is [here](#).

MORE TESTING? Given PK's suggestion for additional outdoor testing, the FCC may well decide to do that. But PK said that if the FCC does order tests, it should do so quickly and issue a ruling in the near term. We don't know how test results will turn out, but it's worth noting that Google -- which opposes Globalstar's petition -- has said that TLPS does not raise technical concerns.

OPPOSITION IS SURMOUTABLE. We think the opposition to Globalstar from major tech companies like Microsoft and Google slowed Globalstar progress toward FCC approval. But we also think the FCC may see that opposition as motivated by concerns over what a Globalstar approval would mean for LTE-U (a much bigger concern for Google and Microsoft than TLPS). And in fact, we think Public Knowledge's letter could soften opposition from cable and Google because it proposes a unified policy approach to unlicensed spectrum (including TLPS) that should appeal to cable and Google.

BOTTOM LINE: Due to Public Knowledge's filing, we have increased conviction that the FCC will approve Globalstar's TLPS proposal. We believe the timeframe for potential approval could perhaps be around March given PK's suggestion for further testing. Approval would be positive for Globalstar and also for **Ruckus**, which Globalstar has said will be one of two vendors of access points for TLPS service.