

Statement Regarding Ex Parte for Revised Terrestrial Authority

The cornerstone of Commission spectrum policy over the past 15 years has been to foster innovation and investment in a combination of licensed and unlicensed spectrum bands for the benefit of American consumers. In furtherance of these objectives, in 2013 the FCC issued an NPRM for Globalstar's provision of Terrestrial Low Power Service ("TLPS"). As proposed, TLPS was intended to maximize consumer benefit by allowing Globalstar's 11.5 MHz of licensed spectrum to be used with 10.5 MHz of unlicensed spectrum in the adjacent ISM band which would provide more intensive use of both licensed and unlicensed spectrum.

Globalstar believes that this service, as originally proposed and demonstrated in the record, was an innovative and pro-consumer solution providing a substantial addition to the nation's spectrum inventory. Nevertheless, Globalstar also understands that when the Commission considers a proposal that shares spectrum with existing services in the critical 2.4 GHz band, prudence dictates that the Commission take a measured and careful approach.

While the Company has worked hard with the Commission and supports the Commission's efforts over the past few years, given the concerns expressed by Commissioners and parties participating in our proceeding, the Company now seeks to narrow the relief it originally requested. Globalstar requests that the Commission adopt a subset of the rules contained in the 2013 NPRM and permit the terrestrial use of Globalstar's 11.5 MHz of licensed spectrum in the 2.4 GHz band for low-power terrestrial broadband services. This new proposal will allow consumers to further benefit from recent technology and ecosystem advancements that make it possible for the band to be rapidly added into the nation's operational broadband inventory.

We believe that Globalstar's concession should resolve the remaining technical and policy issues in this proceeding and allow the Commission to now move forward expeditiously while creating a substantial benefit for the wireless market.

Globalstar's Ex Parte filing is expected to be posted to the FCC's Electronic Comment Filing System on November 10, 2016.

