September 25, 2013

Via Electronic Filing

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street SW
Washington, DC 20554

Re: Globalstar, Inc. Petition for Rulemaking to Reform the Commission’s Regulatory Framework for Terrestrial Use of the Big LEO MSS Band – RM-11685
Ex Parte Notice

Dear Ms. Dortch:

On September 24, 2013, in separate calls to Louis Peraertz, Legal Advisor to Chairwoman Mignon Clyburn; David Goldman, Senior Legal Advisor to Commissioner Jessica Rosenworcel; and Courtney Reinhard, Legal Advisor to Commissioner Ajit Pai, I urged the Commission to promptly adopt a Notice of Proposed Rulemaking (“NPRM”) to reform the Commission’s terrestrial-use rules and policies for the Mobile Satellite Service (“MSS”) Big LEO band.¹

The time is right for the Commission to continue the reforms to its decade-old MSS-terrestrial rules. Three and a half years ago, the National Broadband Plan recommended reform “to increase terrestrial broadband use of MSS spectrum,”² noting the rules have “made it difficult for MSS providers to deploy ancillary terrestrial networks, as well as to establish partnerships with wireless providers or other well-capitalized potential entrants.”³ Over two years ago, the Commission pointed to the absence of terrestrial operations in the MSS bands, and asked how it

³ National Broadband Plan at 88.
could “best increase the value, utilization, innovation and investment in the spectrum for terrestrial services throughout the 2 GHz, Big LEO and L-bands.”

Last year, the Commission took a vital step to reform its terrestrial-use rules. It established the new “AWS-4” band and exercised its Section 316 authority to modify DISH Network’s MSS license to include terrestrial authorizations. The Commission should now do the same for the Big LEO band, by adopting the Big LEO reform NPRM and proposing to modify Globalstar’s MSS license to include terrestrial authority.

The proposed terrestrial-use reforms will benefit consumers, increase investment and innovation, and lead to more intensive use of spectrum. Globalstar’s proposed terrestrial low power service (“TLPS”) will quickly add 22 megahertz to the nation’s wireless broadband spectrum inventory and ease the congestion of Wi-Fi service at high-traffic 802.11 hotspots and other locations. By deploying additional 802.11-based capacity at 2.4 GHz, Globalstar and future terrestrial partners will be able to provide consumers with improved wireless broadband service, including faster data speeds and better Voice over Internet Protocol functionality. TLPS deployments will also deliver meaningful public safety benefits, since still-operating 802.11-based hotspots can provide broadband and voice communications to citizens who otherwise lack access to communications services during disasters.

Globalstar is and remains a satellite company fully committed to the continued development and future success of its global MSS network. Globalstar provides affordable, high-quality MSS to over a half million customers located predominantly in North America. Its

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4. Fixed and Mobile Services in the Mobile Satellite Service Bands at 1525-1559 MHz and 1626.5-1660.5 MHz, 1610-1626.5 MHz and 2483.5-2500 MHz, and 2000-2020 MHz and 2180-2200 MHz, Notice of Proposed Rulemaking and Notice of Inquiry, 25 FCC Rcd 9481, ¶ 26 (2010) (“NOI”).


Mobile satellite services are used during and after major disasters (man-made or natural) when terrestrial networks often fail.  Globalstar’s innovative, consumer-oriented “SPOT” MSS devices are used an average of once a day to initiate a life-saving rescue.

Revenues from flexible terrestrial use of Globalstar’s Big LEO spectrum will help ensure the commercial viability of Globalstar’s MSS network and mission-critical and safety-of-life services. Satellites are expensive. Globalstar has spent over $5 billion since its inception to launch two constellations of LEO satellites and develop ground infrastructure to provide connectivity to consumers, first responders, and other government and enterprise customers outside the reach of terrestrial networks. In February, Globalstar completed the launch of its final second-generation satellites. It invested more than $1 billion to design, manufacture, launch, and deploy this second generation satellite constellation, placing it years ahead of its major MSS competitor. With a fifteen-year design life, Globalstar’s second-generation MSS system will provide highly reliable, crystal-clear CDMA-quality voice and data satellite services to the billions of consumers, public safety personnel, and other customers covered by the new network beyond 2025.

Globalstar urges the Commission to build on the recommendations of the 2010 National Broadband Plan, the Commission’s 2010 NOI, and its 2012 AWS-4 Order by initiating timely pro-innovation, pro-investment reform of the Big LEO MSS-terrestrial rules.


8 Details regarding many of the more than 2400 SPOT-based rescues can be found at “SPOT Saves,” http://findmespot.com/en/spotemergency/ (viewed Sept. 25, 2013).
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: Louis Peraertz
    David Goldman
    Courtney Reinhard