In the Matter of

Globalstar, Inc. Petition for Rulemaking to Reform the Commission's Regulatory Framework for Terrestrial Use of the Big LEO MSS Band

INTRODUCTION

The Wi-Fi Alliance is a global non-profit industry association of hundreds of leading companies devoted to seamless connectivity. With technology development, market building, and regulatory programs, the Wi-Fi Alliance has enabled widespread adoption of Wi-Fi worldwide.

The Wi-Fi CERTIFIED™ program was launched in March 2000. It provides a widely-recognized designation of interoperability and quality and it helps to ensure that Wi-Fi-enabled products deliver the best user experience. The Wi-Fi Alliance has completed more than 15,000 product certifications, encouraging the expanded use of Wi-Fi products and services in new and established markets.

The Wi-Fi Alliance respectfully requests the Commission extend the deadline for comments on the Globalstar Petition for Rulemaking in RM-11685 by two weeks.
DISCUSSION

Globalstar, Inc. has petitioned the Commission for a Rule Making to “Reform the Commission's Regulatory Framework for Terrestrial Use of the Big LEO MSS Band” in RM-11685. The Wi-Fi Alliance is in the process of studying the proposal. Due to the holiday season, many of our member companies are closing the last week or last two weeks of the year, and even for those companies remaining open, employees are generally on leave. A full and proper discussion of the issues, voicing of concerns and voting to approve the formal Wi-Fi Alliance response will be extremely difficult.

Wi-Fi Alliance members manufacture unlicensed devices that use the spectrum from 2400 to 2483.5 MHz band. In its Petition for Rulemaking, Globalstar proposes to provide a terrestrial service that utilizes its adjacent licensed spectrum along with a portion of the 2.4 GHz unlicensed band, from 2473 to 2483.5 MHz. In IEEE 802.11 terms, this spectrum is known as Channel 14, and its unlicensed use is limited in the United States due to the presence of the restricted spectrum at 2483.5 MHz. In its technical appendix, Globalstar represents that it’s proposed out of band emissions rule would not present challenges for some Part 15 devices authorized for the band, but might require new filtering for other Part 15 devices. It is not clear from the Appendix which devices Globalstar examined, or the impact of the new OOBE rule to the millions of Wi-Fi devices operating in the market today, or being sold now. The Wi-Fi Alliance believes it needs to examine carefully the issues raised by the Petition due to the implications for our member companies. We ask that you approve our request for a two week extension.
The Wi-Fi Alliance appreciates the Commission’s consideration of our concern with the December 30th due date, and the need to extend it to enable a full and proper response.

Respectfully submitted

THE WI-FI ALLIANCE

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