February 9, 2015

SUBMITTED ELECTRONICALLY VIA ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Notice of Oral Ex Parte Presentation

IB Docket No. 13-213, RM-11685, 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

Dear Ms. Dortch:

On February 5, 2015, the undersigned, along with representatives of the organizations noted in the attached, met with members of the Commission’s staff, also noted in the attached, regarding the above referenced proceeding.

The parties and Commission staff discussed the current status of this proceeding as well as relevant technical issues. Some parties expressed concern about the potential effects of Globalstar’s proposed terrestrial low power service (“TLPS”) on adjacent unlicensed operations in the 2.4 GHz band. Globalstar’s representatives stated their view that TLPS will have little to no impact on these unlicensed operations, and noted that Globalstar is currently deploying TLPS on an experimental basis. The parties also discussed attending a Globalstar demonstration of TLPS. The attached documents were circulated by Globalstar representatives at the meeting.

Pursuant to Section 1.1206(b)(2) of the Commission’s rules, an electronic copy of this letter is being filed for inclusion in the above-referenced dockets. Please direct any questions regarding this filing to the undersigned.

Very truly yours,

/s/ Russell H. Fox
Russell H. Fox
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/s/ Mark Powell
Mark Powell
Executive Director
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Suite 350
Kirkland, WA 98033

Attachments

cc (with attachments): FCC staff shown in attached (each via e-mail)
Attendees – February 5, 2015 Meeting on FCC IB Docket 13-213

**Wi Fi Alliance**

Rich Kennedy  
Greg Ennis (by phone)  
Russell H. Fox (counsel)

**Globalstar**

Barbee Ponder  
John Dooley (Jarvinian Ventures)  
Dennis Roberson (Roberson and Associates)  
Ken Zdunek (Roberson and Associates)  
Mike Needham (Roberson and Associates)  
Steve Berman (counsel)  
Regina M. Keeney (counsel)

**National Cable and Telecommunications Association**

Rob Alderfer (CableLabs)  
Bernie McKibben (CableLabs)  
Paul R. Margie (counsel)

**Wireless Internet Service Providers Association**

Alex Phillips  
Jack Unger (by phone)  
Stephen E. Coran (counsel, by phone)

**Bluetooth Special Interest Group**

Mark Powell  
Jimmy Salame

**FCC Staff**

*Office of Engineering and Technology*

Julius Knapp  
Ronald Repasi  
Bruce Romano  
Geraldine Matise  
Paul Murray  
Mark Settle  
Rashmi Doshi  
Walter Johnston  
Karen Rackley  
Patrick Forster

*International Bureau*

Troy Tanner  
Jose Albuquerque  
Karl Kensinger  
Chip Fleming  
Sankar Persaud
TLPS and 802.11 Channel 11

- Commonly used IEEE 802.11 channels 1-6-11 have 25 MHz separation
- Proposed TLPS in channel 14 has 22 MHz separation w. Ch.11

802.11 g/n (OFDM) ~20 MHz channel width: 16.25 MHz used by 802.11n sub-carriers