Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of

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
IB Docket No. 13-213
RM-11685

TLPS & Bluetooth Demonstrations

FCC Technology Center - March 6, 2015

The Bluetooth Special Interest Group thanks the Federal Communication Commission (FCC) and its staff for hosting the TLPS & Bluetooth demonstrations at the FCC Technology Center, and for providing an opportunity for the Bluetooth SIG and its members to show the impact of TLPS on Bluetooth devices and Bluetooth users.

Consistent with previous communications from the Bluetooth SIG on this matter, the demonstrations conducted by the Bluetooth SIG, and observed by representatives from Globalstar and the FCC, clearly showed that operation of TLPS interferes significantly with Bluetooth devices.

Despite the short notice of the demonstrations, insufficient testing time, a small and crowded test facility and limited understanding of the TLPS setup, two demonstration scenarios conducted by the Bluetooth SIG successfully provided an illustration of the interference cases; Bluetooth hearing aids and Bluetooth “Smart” Lighting.

- Hearing Aid demonstrations by the Bluetooth SIG showed that the packet loss experienced by Bluetooth hearing aids jumped from 10% to almost 20% with TLPS present. (Packet loss over 10% would cause significant audio disruption for the user).
“Smart” lighting demonstrations by the Bluetooth SIG showed that the number of instances where the “Smart” lights failed to receive commands (ON/OFF and Color change) increased 4 (four) times with TLPS present.

• The Bluetooth SIG proposed additional demonstration scenarios, but unfortunately the room was not large enough and so these demonstrations could be conducted at a later time.

• The Bluetooth SIG plans to file a detailed report of its findings into the record for this proceeding by 3/20/15.

The results of these demonstrations clearly show the potential for significant impact upon American consumers and users of Bluetooth products by a deployment of TLPS. As a result the Bluetooth SIG again requests that the FCC not approve the proposed rulemaking.

On behalf of the Bluetooth SIG,

Mark Powell
Executive Director
Bluetooth SIG, Inc.
425.691.3530
mpowell@bluetooth.com