May 08, 2013

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW,
Room TW-A325
Washington, DC 20554

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

Dear Ms. Dortch:

Wi-Fi Alliance filed comments in the above-captioned proceeding. After review of Globalstar’s reply comment, Wi-Fi Alliance requests that if the Commission elects to proceed to a Notice of Proposed Rulemaking that certain questions as indicated below be included in that rulemaking document.

Globalstar, in response to Wi-Fi Alliance and other comments filed in this proceeding, stated on page 14 of its reply that “Globalstar does not request operating rights in the 2473-2483.5 MHz band that are superior to those of other unlicensed users. Like other unlicensed services, TLPS transmissions on unlicensed spectrum below 2483.5 MHz will enjoy no protection from interference from other licensed and unlicensed operations. In particular, Globalstar’s TLPS will accept any harmful interference from unlicensed operations on Wi-Fi Channel 11....”  

On page 13, Globalstar specifically recognizes that “Bluetooth devices and other unlicensed equipment will be able to coexist with TLPS and continue operating in the 2473-2483.5 MHz band segment.” Wi-Fi Alliance notes that Globalstar made no such statement about commercial Wi-Fi technologies’ ability to operate at 2473-2483.5 MHz.

While commercial Wi-Fi today does not transmit above Channel 11 in the United States, Wi-Fi Alliance believes that there is no bar in the FCC rules to prevent it from doing so, provided it can meet the requirements set forth in the Commission’s rules concerning out of band emissions. Wi-Fi technology is developing at a rapid pace, and Wi-Fi Alliance cannot rule out the possibility that, based on decisions about filtering and/or power levels, or future technology developments, there will emerge...

1 47 C.F.R. Section 15.15 (unlicensed devices must accept all interference).
a way for Wi-Fi to utilize 2473-2483.5 MHz or indeed some or all of Channels 12 and 13 (2457-2482 MHz). Wi-Fi Alliance is concerned that Globalstar assumes that commercial Wi-Fi operations in the United States will forever remain on Channel 11 and below. Moreover, the assertion Globalstar makes with respect to Bluetooth appears to grandfather existing unlicensed devices (“continue operating”) but not new operations in 2473-2483.5 MHz.

The questions we ask the FCC to include in any rulemaking are: (1) Is there any aspect of the Globalstar proposal that prevents commercial (non-TLPS) Wi-Fi from utilizing the 2473-2483 MHz band, and if so, what are the policy implications of that? (2) Globalstar’s plan, per its reply, includes agreement to accept Wi-Fi interference from Channel 11. Should the Commission likewise require it to accept interference from possible future commercial Wi-Fi operations on Channels 12 and 13? (3) Globalstar is proposing a previously unanticipated use of the spectrum between 2483.5 MHz to 2495 MHz (i.e. TLPS in Channel 14). In so far as the existing out-of-band emissions rules for the upper portion of the ISM band were intended to protect Mobile Satellite Services in the adjacent band, should the Commission consider revising the band-edge restriction and OOB limits specified in Parts 15.205 and 15.209 to enable the use of channels 12 and 13 by Wi-Fi and other unlicensed devices, provided that use does not interfere with Globalstar’s licensed operation of TLPS in the upper half of Channel 14?

Respectfully submitted,
WI-FI ALLIANCE

[Signature]

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