



September 13, 2019

By Email to spectrumengineering-genieduspectre.ic@canada.ca

MR. MARTIN PROULX
Director General, Engineering Planning and Standards Branch
Innovation, Science and Economic Development Canada
235 Queen Street
Ottawa, ON K1A 0H5

Re: Notice of Application Received from Globalstar Canada Satellite Co. for Ancillary Terrestrial Component (ATC) Authority in the 2.4 GHz Band (2483.5 – 2500 MHz), published August 8, 2019 --- Comments of Globalstar Canada Satellite Company.

Globalstar Canada Satellite Co.¹, a company incorporated under the laws of Nova Scotia and a Mobile Satellite Service Provider (“Globalstar Canada”) appreciates the opportunity to provide comments pursuant to the Notice issued by Innovation, Science and Economic Development Canada (ISED) regarding its Application for Terrestrial ATC Authority (“Notice”).

As Globalstar Canada stated in its application, it has successfully completed the standardization work at 3GPP, and multiple hardware manufacturers are now manufacturing equipment and submitting such equipment for type certification in the United States and other countries where Globalstar has achieved terrestrial authorization. In its Notice, ISED correctly points out that ATC applications have evolved significantly over the past fifteen (15) years with advancements in technology, networks and applications:

These applications include higher speed voice and data, support of Internet-of-Things deployments, deployment of small cells in support of other mobile networks, and private long-term evolution (LTE) networks. Many of these applications will support the deployment of innovative 5G services and provide an opportunity for improved services through additional capacity while remaining compatible with the ongoing delivery of the primary mobile satellite services (“MSS”).

Notice, Section 2. Canadian ATC Policy.

Globalstar Canada and its technology partners are committed to bringing these new communications solutions to Canada upon final approval of Globalstar’s application.

¹ Globalstar Canada Satellite Co. is a wholly-owned subsidiary of Globalstar, Inc.

While Globalstar Canada will continue to provide its unique MSS solutions to the Canadian market, Canada's existing ATC rules should be modified and updated to permit the innovative new services and applications described in ISED's Notice.

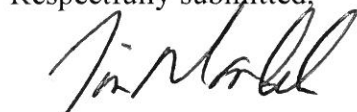
First, the existing requirement for dual-mode user equipment should be eliminated for the Big LEO band, as it has previously been eliminated for the 2 GHz band. As ISED points out, "no cost effective dual-mode equipment ecosystem ha[s] emerged" and "the imposition of MSS delivery requirements would be sufficient to ensure the ongoing delivery of MSS in the absence of a dual-mode requirement." Globalstar Canada agrees.

Globalstar further supports ISED's proposal to permit the same low-power, TDD LTE ATC system that was previously authorized by the Federal Communications Commission in the United States of America and the adoption of similar technical rules for the operation of such a system. While Globalstar Canada supports ISED's adoption of the same power limits imposed in the United States, Globalstar Canada requests that it be permitted to apply for a waiver of the power limit in order to operate at a higher power limit, while maintaining the required OOB limits, in certain specific deployments where such higher power is necessary to meet a specific customer's needs. Globalstar believes that maintaining the same commercial OOB limits while allowing for higher power in certain circumstances where necessary will best serve user needs and deliver an increased quality of service while continuing to ensure peaceful coexistence with adjacent operations.

Regarding the topic of spectrum license fees, Globalstar Canada supports ISED's approach to require site-specific radio station licenses and associated fees prior to deployment of each installation until such time as a spectrum licensing fee regime is established through a separate public consultation process. Globalstar Canada further supports ISED's proposal to require an annual report summarizing the number and general location of operating radio stations, so long as the proposal does not require the public reporting of competitively sensitive or otherwise proprietary information.

Globalstar Canada stands ready to provide any additional information that ISED may request in order to finalize and complete its terrestrial authorization.

Respectfully submitted,



Jim Mandala
Vice President and General Manager
Globalstar Canada Satellite Co.