

March 27, 2017

Mr. Martin Proulx
Director General, Engineering, Planning and Standards Branch
Spectrum, Information Technologies and Telecommunications Sector
Innovation, Science and Economic Development Canada
235 Queen Street
Ottawa, ON K1A 0H5

Re: Canada Gazette, Part I published January 28, 2017, Consultation on the Technical and Policy Framework for Radio Local Area Networks Devices Operating in the 5150-5250 MHz Frequency Band, Notice Number SMSE-002-17

Dear Mr. Proulx:

Globalstar Canada Satellite Co. (Globalstar Canada) would like to take this opportunity to submit its comments to ISED on the above Consultation document, as adopting a new higher power regulation for RLAN operation in Canada would have a direct impact on Globalstar Canada's use of the 5150-5250 MHz band for feederlink to its satellite network.

While Globalstar Canada did participate in the working group which drafted the RABC comments, we felt that our concerns were not fully captured in the consolidated final list of comments.

Globalstar Canada is a wholly owned subsidiary of Globalstar Inc. "Globalstar" (NYSE MKT: GSAT) and the leader in satellite messaging and emergency notification technologies in 120 countries. Globalstar requires internationally harmonized regulations that set power levels and antenna mask restrictions which will be followed by all countries around the world. These restrictions ensure the protection of current and future satellite networks.

We do not believe the US regulations can be applied on a worldwide basis and guarantee protection of the Globalstar satellite network. Therefore, we feel that the best place to address this issue will be at WRC-19 under Agenda Item 1.16. The WRC-19 decisions will result in new ITU Regulations which all countries around the world will follow when they ratify the Final Acts of WRC-19. These regulations will provide Globalstar with a harmonized set of technical and regulatory rules which will be implemented by a majority of countries around the world.

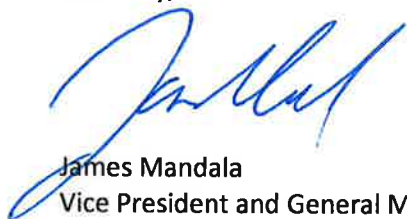
If your Department would implement any new domestic regulations in this band now, it could signal to the world that Canada has developed its position on Agenda Item 1.16. In fact, the Canadian Preparatory Committee for WRC-19 has not developed a position on this Agenda Item, and the ITU-R has only started its technical and regulatory studies in preparation for the conference. Also, as a respected ITU administration, this could lead to other countries adopting similar domestic and WRC positions. We would urge the Department to wait until after WRC-19.



Globalstar Canada fully understands the important responsibility of your Department to achieve the most efficient, effective and economic use of the spectrum. Globalstar network is an incumbent user of the spectrum and requires protection of its current and future satellite operations. It provides an important and vital mobile satellite voice, data, and emergency alert services to Canadians and to customers around the world.

Globalstar Canada would be happy to further discuss with your Department any proposed changes to the regulations for the 5150-5250 MHz band.

Sincerely,



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

Copy : Chantal Beaumier, Director, Space Services Planning
Marc Girouard, Director, Coordination and Terrestrial Engineering