

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Streamlining Deployment of Small Cell Infrastructure by Improving Wireless Facilities Siting Policies; Mobilitie, LLC Petition for Declaratory Ruling	)	WT Docket No. 16-421

**REPLY COMMENTS OF THE  
NATIONAL ASSOCIATION OF BROADCASTERS**

**I. INTRODUCTION AND SUMMARY**

The National Association of Broadcasters (NAB)<sup>1</sup> hereby files these reply comments concerning the above-captioned proceeding.<sup>2</sup> NAB generally supports the Public Notice and Globalstar’s comments in this docket concerning streamlining of governmental review of Globalstar’s deployment of small cells under its Ancillary Terrestrial Component (ATC) authority. However, the Commission should make plain that any such streamlining does not relieve Globalstar of its obligation to coordinate with, and not cause interference to, operations in grandfathered Broadcast Auxiliary Service (BAS) spectrum.

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<sup>1</sup> NAB is a nonprofit trade association that advocates on behalf of free local radio and television stations and broadcast networks before Congress, the Federal Communications Commission and other federal agencies, and the courts.

<sup>2</sup> *Comment Sought on Streamlining Deployment of Small Cell Infrastructure by Improving Wireless Facilities Siting Policies; Mobilitie, LLC Petition for Declaratory Ruling*, Public Notice, DA 16-1427, WT Docket No. 16-421 (rel. Dec. 22, 2016).

## II. NAB SUPPORTS THE GOAL OF REDUCING UNNECESSARY REGULATORY BURDENS, WHILE ASSURING GLOBALSTAR MEETS ITS OBLIGATIONS TO AVOID INTERFERENCE TO THE BROADCAST AUXILIARY SERVICE

Late last year, the Commission granted Globalstar ATC authority to operate a terrestrial broadband network in the spectrum allocated to it for use in the Mobile Satellite Service (MSS), namely 2473-2483.5 MHz.<sup>3</sup> This spectrum overlaps and is adjacent to grandfathered BAS spectrum, and thus requires coordination with BAS operations to avoid interference.

In the instant proceeding, Globalstar seeks to streamline regulatory approval processes to enable rapid deployment of its broadband network. NAB does not object to either the Bureau's proposals in the Public Notice to ease state and local approval of tower siting procedures for small cells or Globalstar's further proposals<sup>4</sup> regarding tower siting procedures on federal lands.

However, Globalstar is obligated to consult local frequency coordinators before deploying ATC base stations.<sup>5</sup> There are 498 active TV Pickup licenses in this band, which television stations use to provide critical electronic news gathering capabilities and other services necessary to support local broadcasting. Globalstar's terrestrial use of its spectrum in proximity to these TV pickup sites creates the potential for interference including brute force overload on BAS receivers, making BAS operations impossible. In authorizing Globalstar's use of ATC in this band, the Commission stated that it "understand[s] that coordination can be difficult when equipment utilizing the BAS channels in question is

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<sup>3</sup> *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*, Report and Order, 31 FCC Rcd 13801 (2016) (Globalstar R&O).

<sup>4</sup> Globalstar Comments at 14-15.

<sup>5</sup> Globalstar R&O, 31 FCC Rcd at 13824, ¶ 47.

mobile and often in different locations, however, consistent with existing policy, Globalstar must coordinate its operations with BAS operations to avoid causing harmful interference to those grandfathered operations.” To the extent that streamlining governmental review makes it easier to facilitate this mandatory coordination with broadcasters, NAB supports this reform. However, the Commission should caution Globalstar that any such review streamlining does not relieve Globalstar of its obligations to coordinate and not interfere with existing BAS operations.

### III. CONCLUSION

As the Commission seeks to find more spectrum for mobile broadband, terrestrial use of frequencies allocated for satellite use is a valuable tool. However, it creates myriad interference concerns that must be addressed prior to deployment. NAB urges the Globalstar and the Commission to keep in mind these essential interference protections as it looks to speed deployment of these types of services.

Respectfully submitted,

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