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globalstar.com

December 14, 2020

Via Electronic Filing

Marlene Dortch
Secretary
Federal Communications Commission
45 L Street NE
Washington, DC 20554

Re: Lynk Global, Inc. – FCC File No. 1184-EX-ST-2020 (Call Sign WQ9XDP)

Dear Ms. Dortch:

Globalstar, Inc. (“Globalstar”) hereby addresses the 120-day Special Temporary Experimental Authorization granted to Lynk Global, Inc. (“Lynk”) on October 30, 2020 (“October 30 STA”), enabling Lynk to engage in short-term experimental operations involving GSM devices located in Honolulu, Hawaii, and a Low Earth Orbit (“LEO”) satellite repeater payload.¹ Globalstar objects to the continuation of these experimental operations in Hawaii beyond the February 26, 2021 expiration date of Lynk’s current STA.

Globalstar is a leading provider of global mobile satellite services (“MSS”). Globalstar is licensed domestically for uplink transmissions (mobile earth stations to satellites) in the Big LEO band at 1610-1618.725 MHz, and for downlink transmissions (satellites to mobile earth stations) in the United States and around the world at 2483.5-2500 MHz.² On December 11, 2020, Globalstar submitted applications for permanent authority for three gateway feeder link earth station antennas located in Naalehu, Hawaii.³ While Globalstar currently does not provide MSS coverage to users located in Hawaii and

¹ Application of Lynk Global, Inc. for Special Temporary Authority, FCC File No. 1184-EX-ST-2020 (granted Oct. 30, 2020).

² See, e.g., *Application of Loral/Qualcomm Partnership, L.P. for Authority to Construct, Launch, and Operate Globalstar, a Low Earth Orbit Satellite System, to Provide Mobile Satellite Services in the 1610-1626.5 MHz/2483.5-2500 MHz Bands*, Order and Authorization, 10 FCC Rcd 2333 (1995); *Globalstar Licensee LLC*; *Application for Modification of Non-geostationary Mobile Satellite Service Space Station License*; *GUSA Licensee LLC*; *Applications for Modification of Mobile Satellite Service Earth Station Licenses*; *GCL Licensee LLC*, *Applications for Modification of Mobile Satellite Service Earth Station Licenses*, Order, 26 FCC Rcd 3948 (IB 2011).

³ See FCC File Nos. SES-LIC-20201211-01364, SES-LIC-20201211-01365, and SES-LIC-20201211-01366 (filed Dec. 11, 2020).

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adjacent Pacific Ocean areas, grant of these applications and activation of the proposed Hawaii gateway will create an extensive new MSS coverage area over Hawaii and surrounding waters.

Under the October 30 STA, Lynk is authorized to transmit satellite downlink signals at 1615.35-1617.495 MHz on an experimental basis whenever its satellite repeater payload is within view of its ground test facility in Hawaii. Given Globalstar's pending gateway antenna applications that will extend its licensed MSS operations at 1610-1618.725 MHz to Hawaii and proximate waters, Globalstar does not consent to Lynk's continued use of the 1615.35-1617.495 MHz band segment in Hawaii beyond the existing October 30 STA. The Commission should not grant any extension of this STA, and Lynk's use of Globalstar's licensed MSS frequencies for experimental satellite downlink transmissions at 1.6 GHz should therefore terminate following the February 26, 2021 expiration of this temporary authorization.

Please direct any questions regarding this response to the undersigned

Respectfully submitted,

/s/ L. Barbee Ponder IV

L. Barbee Ponder IV
General Counsel & Vice President,
Regulatory Affairs
Globalstar, Inc.

cc: Margo Deckard, Lynk Global, Inc.