



Globalstar Audit Responses: FCC ID: TSEMCM-4M

Federal Communications Commission
Authorization and Evaluation Division

To Whom It May Concern:

Copied below is the original correspondence sent by the FCC concerning Globalstar FCC ID: TSEMCM-4M, please see their responses in blue bold-faced type. Also please see revised test report that includes updated excerpts and responses to the applicable standard. Should there be any further question in this matter please feel free to contact us at bacl.regulatory@baclcorp.com

Douglas Mendez
BACL Document Control Supervisor
Phone: (408) 732-9162 x3038
Fax: (408) 732-9164

To: Anthony Navarra
From: Tim Harrington (Tim.Harrington@fcc.gov)
FCC Equipment Authorization Branch
Re: FCC ID: TSEMCM-4M
Applicant: Globalstar USA, LLC
Correspondence Reference Number: 38596
731 Confirmation Number: *****
Date of Original Email: 05/10/2007

Subject: audit

NOTE - This Certification grant was previously subject to administrative action based on 25.129 being applicable only for portable devices as defined by 2.1093, deletion of 25.200 optional Certification by 67 FR 61816 for other GMPCS devices such as 2.1091-mobile, and the situation that 99-67 docket record at FCC EDOCS search page did not address DA-02-1578 (DOC-224026).

Although FCC has re-issued this Certification grant based on above general considerations, certain additional info is needed to address 47 CFR sec. 2.962, 2 subpart J (2-J), part 25, including the following.

TCB please coordinate response to following:

1) This device appears to consist of a rack-mounted enclosure "modem" with a separate antenna unit, therefore it appears to be what is considered a fixed-mounted device with respect to FCC RF exposure rules. Please explain whether and how this device qualifies as a "mobile earth station," i.e. per 25.201, such that 25.216 etc are applicable as reported herein.

Response: "This is a portable desktop device with the option of installing rack-mount brackets. The device is designed primarily for portable and mobile applications but may also be used for ancillary fixed applications as permitted in Globalstar's mobile earth station license (see Airtouch Satellite Services US, Inc. [now GUSA Licensee LLC], Order and Authorization, DA 99-2010 (Oct. 4, 1999), at para. 22)."

2) Based on DA-02-1578 and discussions in FCC-03-283, FCC OET Lab will allow optional 2-J Certifications for some part 25 devices, namely such devices covered under the conventional station-class definition of mobile, which generally encompasses devices covered by 2.1093-portable and 2.1091-mobile. Per 03-283, neither required nor optional Certification is appropriate for general feeder-link transmitters, which this device seems to be. Please explain whether and how this device qualifies as an "end user terminal," "positioned at one end of a communication channel," per intent of docket 99-67, or submit letter from applicant requesting application dismissal.

Response: As described the response to 1) above, the MCM-4M is a multi channel earth station device used by a subscriber to transmit and receive data via satellite.

3) User manual indicates aircraft-mount for antenna is intended - per FCC-03-283, 2-J Certification is not applicable for transceivers "designed for installation in aircraft or maritime vessels." Please explain, or submit letter from applicant requesting application dismissal.

Response: The aircraft and maritime references have been removed in the updated version of the MCM-4M user manual.

4) Pending resolution of above items, adjustments may be needed in this filing for RF exposure compliance information and grant remarks.

Response: Globalstar intends to proceed with the filing. A 30 cm minimum separation mounting point requirement is specified in the revised user manual. This is a practical mounting requirement and meets the FCC RF exposure rules specified in the Office of Engineering and Technology (OET) Bulletin 65.



5) Pending resolution of preceding items, please include the following in grant remarks:
In accordance with DA-02-1578 and FCC-03-283, this is an optional Certification for an earth-station transceiver designed for operation by end users of satellite communication services.

Response: The grant remarks will be added as instructed

The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested information within 30 days of the original e-mail date may result in application dismissal pursuant to Section 2.917(c).