

Categories of Services for 214 Applications
(Streamline/Non-streamline)

- LIMITED/GLOBAL RESALE SERVICE
- LIMITED/GLOBAL FACILITIES-BASED SERVICE
- LIMITED/GLOBAL FACILITIES-BASED/RESALE SERVICE
- INDIVIDUAL FACILITIES-BASED SERVICE
- INTERCONNECTED PRIVATE LINE RESALE SERVICE
- INMARSAT AND MOBILE SATELLITE SERVICE
- INTERNATIONAL SPECIAL PROJECT
- SWITCHED RESALE SERVICE
- TRANSFER OF CONTROL
- ASSIGNMENT OF LICENSE
- PRO FORMA TRANSFER/ASSIGNMENT
- SPECIAL TEMPORARY AUTHORITY
- SUBMARINE CABLE LANDING LICENSE

Description of Application: _____

READ INSTRUCTIONS CAREFULLY
BEFORE PROCEEDING

FEDERAL COMMUNICATIONS COMMISSION
REMITTANCE ADVICE

APPROVED BY OMB 3060-0589

SPECIAL USE

FCC USE ONLY
FCC/MELLOW MAR 17 2000

(1) LOCKBOX # 358115

PAGE NO. ____ OF ____

SECTION A - PAYER INFORMATION

(2) PAYER NAME (if paying by credit card, enter name exactly as it appears on your card)

(4) STREET ADDRESS LINE NO. 1
Crowell & Moring LLP

(5) STREET ADDRESS LINE NO. 2
1001 Pennsylvania Avenue, N.W.

(3) TOTAL AMOUNT PAID (dollars and cents)
\$ 780.00

(6) CITY

Washington

(7) STATE

DC

(8) ZIP CODE

20004-2595

(9) DAYTIME TELEPHONE NUMBER (include area code)

(202) 624-2500

(10) COUNTRY CODE (if not in U.S.A.)

**IF PAYER NAME AND THE APPLICANT NAME ARE DIFFERENT, COMPLETE SECTION B
IF MORE THAN ONE APPLICANT, USE CONTINUATION SHEETS (FORM 159-C)**

SECTION B - APPLICANT INFORMATION

(11) APPLICANT NAME (if paying by credit card, enter name exactly as it appears on your card)

Government Services, LLC

(12) STREET ADDRESS LINE NO. 1

c/o Globalstar, L.P.

(13) STREET ADDRESS LINE NO. 2

3200 Zanker Road

(14) CITY

San Jose

(15) STATE

CA

(16) ZIP CODE

95134

(17) DAYTIME TELEPHONE NUMBER (include area code)

(408) 933-4400

(18) COUNTRY CODE (if not in U.S.A.)

COMPLETE SECTION C FOR EACH SERVICE. IF MORE BOXES ARE NEEDED, USE CONTINUATION SHEETS (FORM 159-C)

SECTION C - PAYMENT INFORMATION

(19A) FCC CALL SIGN/OTHER ID

(20A) PAYMENT TYPE CODE (PTC)

(21A) QUANTITY

(22A) FEE DUE FOR (PTC) IN BLOCK 20A

FCC USE ONLY

(23A) FCC CODE 1

C

U

T

1

\$ 780.00

(19B) FCC CALL SIGN/OTHER ID

(20B) PAYMENT TYPE CODE (PTC)

(21B) QUANTITY

(22B) FEE DUE FOR (PTC) IN BLOCK 20B

FCC USE ONLY

(23B) FCC CODE 1

(19C) FCC CALL SIGN/OTHER ID

(20C) PAYMENT TYPE CODE (PTC)

(21C) QUANTITY

(22C) FEE DUE FOR (PTC) IN BLOCK 20C

FCC USE ONLY

(23C) FCC CODE 1

(24C) FCC CODE 2

(19D) FCC CALL SIGN/OTHER ID

(20D) PAYMENT TYPE CODE (PTC)

(21D) QUANTITY

(22D) FEE DUE FOR (PTC) IN BLOCK 20D

FCC USE ONLY

(23D) FCC CODE 1

(24D) FCC CODE 2

SECTION D - TAXPAYER INFORMATION (REQUIRED)

(25) PAYER TIN

0 5 2 1 1 5 0 3 5 8

(26) COMPLETE THIS BLOCK ONLY IF APPLICANT NAME IN B-1 IS DIFFERENT FROM PAYER NAME IN A-2

APPLICANT TIN

0 2 2 3 7 0 4 3 9 5

SECTION E - CERTIFICATION

(27) CERTIFICATION STATEMENT

I, William D. Wallace (PRINT NAME), certify under penalty of perjury that the foregoing and supporting information are true and correct to the best of my knowledge, information and belief. SIGNATURE *W. Wallace*

SECTION F - CREDIT CARD PAYMENT INFORMATION

(28) MASTERCARD/VISA ACCOUNT NUMBER:

MASTERCARD VISA ACCOUNT NUMBER: [Grid for card number]

EXPIRATION DATE:

EXPIRATION DATE: [Grid for month/year]

VISA

I hereby authorize the FCC to charge my VISA or MASTERCARD for the service(s)/authorization(s) herein described.

AUTHORIZED SIGNATURE

SEE PUBLIC BURDEN ESTIMATE ON REVERSE

FCC FORM 159 JULY 1997 (REVISED)

Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)
)
) Application of Government Services, LLC,) File No. _____
) D/B/A Globalstar Government Services,)
) For Authority to Provide International)
) Services Pursuant to Section 214)
) Of the Communications Act of 1934)

APPLICATION FOR SECTION 214 AUTHORIZATION

Government Services, LLC, d/b/a Globalstar Government Services ("GGS"), hereby requests authority pursuant to Section 214 of the Communications Act of 1934, as amended, and Part 63 of the Commission's Rules to provide international switched voice and data services through resale of the telecommunications services of other carriers.

I. SECTION 63.18 REQUIREMENTS

The following information is submitted in accordance with Section 63.18(e)(3) of the Commission's Rules (47 C.F.R. § 63.18(e)(3)), and the applicable paragraphs thereunder.

- a. Name, Address and Telephone Number of Applicant**
- Government Services, LLC
c/o Globalstar, L.P.
3200 Zanker Road
San Jose, CA 95134
(408) 933-4400

b. Corporate Organization

GGGS is a limited liability company organized under the laws of the State of Delaware.

c. Contact Persons for Correspondence

William F. Adler
Government Services, LLC
c/o Globalstar, L.P.
3200 Zanker Road
San Jose, CA 95134
(408) 933-4400

William D. Wallace
Crowell & Moring LLP
1001 Pennsylvania Avenue, NW
Washington, DC 20004
(202) 624-2500

d. No Prior Section 214 Authorizations

GGGS has not previously been granted a Section 214 authorization.

e. Resale Carrier

(i) GGGS is requesting Section 214 authority to operate as a resale carrier pursuant to Section 63.18(e)(2).¹

Footnote
¹(GGGS)intends to resell the Globalstar services offered by Globalstar USA, Inc. See File No. ITC-214-19990728-00484 (granted in Report No. TEL-00131, DA 99-1782, released Sept. 2, 1999); File No. ITC-214-19991229-0795 (granted in Report No. TEL-00191, DA 00-361, released Feb. 24, 2000). GGGS recognizes and acknowledges that the facilities-based services of Globalstar USA, Inc., are subject to the terms and conditions in the "Transition Agreement" between Globalstar USA, Inc., Vodafone AirTouch PLC and the U.S. Department of Defense, the U.S. Department of Justice, and the Federal Bureau of Investigation, attached to Globalstar USA, Inc.'s Section 214 application, filed December 29, 1999.

(ii) GGS requests all resale authority permitted under Section 63.23 of the Commission's Rules.

(iii) GGS certifies that it will comply with the terms and conditions contained in Sections 63.21 and 63.23.

f. Not Applicable

g. Not Applicable

h. Name, Address and Business of Owners

GGS is a wholly-owned subsidiary of Loral General Partner, Inc. ("LGP"), 600 Third Avenue, New York, NY, 20016. LGP is a wholly-owned subsidiary of Loral Space & Communications Corporation (same address), which in turn is a wholly-owned subsidiary of Loral Space & Communications Ltd. ("Loral Space") (same address). Loral Space is a leading satellite company, with interests in satellite construction and satellite telecommunications companies. There are no interlocking directorates between GGS and a foreign carrier.

i. Affiliations with Foreign Carriers

GGS certifies that it is "affiliated" within the meaning of Section 63.09(e) with two authorized Globalstar service providers: Globalstar do Brasil, S.A., in Brazil; and Globalstar Canada Co. in Canada. The ultimate parent of GGS, Loral Space, owns (a) 66.7 percent of Loral/DASA Partnership, L.P., which owns indirectly 100 percent of Globalstar do Brasil, and (b) 49.9 percent of Globalstar Canada Satellite Co., which owns indirectly 53.3 percent of Globalstar Canada Co.

GGS certifies that it is also "affiliated" with Satelites Mexicanos S.A. de C.V. ("SatMex"), a Fixed-Satellite Service ("FSS") provider in Mexico. GGS's ultimate

parent Loral Space owns indirectly 49 percent of the voting stock of the Mexican holding company which owns and controls SatMex.

j. Destination Markets

(1) GGS certifies that it is not a foreign carrier in any requested destination market.

(2) GGS does not control a foreign carrier in any requested destination market.

(3) Loral Space controls a foreign carrier in a requested destination market, Globalstar do Brasil in Brazil.

(4) GGS is owned and controlled by only one carrier; therefore, this section is not applicable.

k. Competition Issues

(1) The destination country named in paragraph (j), Brazil, is a Member of the World Trade Organization.

(2) As a start-up service provider, Globalstar do Brasil has no market share, and, therefore, lacks market power in international telecommunications market in Brazil.

l. Services of U.S. Carriers to Affiliated Destination Markets

GGS is affiliated with Globalstar do Brasil, the Globalstar service provider in Brazil and with Globalstar Canada Co. in Canada. Globalstar do Brasil and Globalstar Canada Co. just recently commenced providing service. As start-up

service providers, neither Globalstar do Brasil nor Globalstar Canada Co. has any share of the international telecommunications market.

GGS is also affiliated with SatMex, an FSS provider in Mexico. SatMex offers satellite transmission capacity on a bulk basis to telecommunications companies for public telephone networks in Mexico and to corporate customers for private business networks. As a provider of bulk capacity, SatMex does not participate directly in providing international telecommunications services to end users, and, therefore, has no share of the international telecommunications market.

m. Non-Dominant Classification

GGS qualifies for non-dominant classification for the resale of international switched telecommunications services pursuant to Section 63.10(a)(3).

GGS is affiliated with Globalstar do Brasil and Globalstar Canada Co., the Globalstar service providers in Brazil and Canada, respectively. However, as described above in paragraph (l), Globalstar do Brasil and Globalstar Canada Co. have no share of the international telecommunications market. Neither service provider offers local access service, nor is affiliated with the incumbent wireline telecommunications providers in Brazil and Canada.

GGS is also affiliated with SatMex, an FSS provider in Mexico. However, as described above in paragraph (l), SatMex offers satellite transmission capacity on a bulk basis, and itself has no share of the international telecommunications market in Mexico. SatMex is not affiliated with the incumbent local and long distance service provider in Mexico, Telefonos de Mexico.

n. Special Concessions

GGGS certifies that it has not agreed to accept special concessions directly or indirectly from any foreign carrier with respect to any U.S. international route where the foreign carrier possesses market power on the foreign end of the route and will not enter into such agreements in the future.

o. Anti-Drug Abuse Act Certification


GGGS hereby certifies, pursuant to Sections 1.2001 through 1.2003 of the Commission's Rules, that no party to this application is subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.

p. Streamlined Processing

This application qualifies for streamlined processing pursuant to Section 63.12 of the Commission's Rules (47 C.F.R. § 63.12) because:

- GGS qualifies for the presumption of non-dominance pursuant to Section 63.12(c)(1)(ii), as explained above in paragraph (m).
- GGS will provide international switched service solely through the resale of an unaffiliated U.S. facilities-based carrier's international switched services, pursuant to Section 63.12(c)(1)(iv), and the only affiliated destination markets are WTO Member countries.

II. PUBLIC INTEREST CONSIDERATIONS REGARDING FOREIGN OWNERSHIP IN U.S. COMMON CARRIERS

GGGS is a Delaware limited liability company, and is a wholly-owned indirect subsidiary of Loral Space, a company incorporated in the Islands of Bermuda.  Bermuda is a self-governing Dependent Territory of the United Kingdom, a Member of the World Trade Organization. Pursuant to the Commission's standard for

foreign participation in U.S. international common carriers, there is a presumption that ownership of GGS by Loral Space is in the public interest.²

III. CONCLUSION

For the reasons set forth above, the public interest, convenience and necessity would be furthered by grant of this application, and the Commission should grant GGS authority to resell the international switched services of other carriers.

Respectfully submitted,

GLOBALSTAR GOVERNMENT SERVICES, LLC

By:



William F. Adler
Assistant Secretary
c/o Globalstar, L.P.
3200 Zanker Road
San Jose, CA 95134
(408) 933-4400

Date: March 13, 2000

² See Rules and Policies on Foreign Participation in the U.S. Telecommunications Market, 12 FCC Rcd 23891, 23913 (1997). In any event, the FCC has previously determined that the "home market" of Loral Space is the United States, and, therefore, there is no question that participation by Loral Space in the international telecommunications market is in the public interest. See AT&T Corp. and Loral SpaceCom Corp., 12 FCC Rcd 925 (Int'l Bur. 1997); Loral Corp., 12 FCC Rcd 21164, 21169 (Int'l Bur. 1997); Market Entry and Regulation of Foreign-Affiliated Entities, 11 FCC Rcd 3873, 3948-52 (1995).