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April 12, 2006

Mr. Donald Abelson
Chief, International Bureau
Federal Communications Commission
445 Twelfth Street, S.W., Room 6-C750
Washington, D.C. 20554

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Policy Branch
International Bureau

Federal Communications Commission
Office of Secretary

Policy Branch
International Bureau

Re: Call Sign S2115 - Globalstar 1.6/2.4 GHz Mobile-Satellite System
File No. SAT-A/O-19910603-00010

Dear Mr. Abelson:

Globalstar began launching its satellites on February 14, 1998, and successfully launched twenty-four satellites (with one launch failure) by June 10, 1999. Globalstar reported these developments to the Commission in its Annual Report pursuant to 47 C.F.R. § 25.143(e), dated June 30, 1999. Globalstar has subsequently provided timely Annual Reports to the Commission as required by Section 25.143(e) of the Commission's rules, 47 C.F.R. § 25.143(e).

In addition to the annual reporting requirement of Section 25.143(e), Section 25.121(d)(2) of the Commission's rules, 47 C.F.R. § 25.121(d)(2), provides that

For non-geostationary satellite orbit satellites, the license term will begin at 3 a.m. EST on the date that the licensee certifies to the Commission that its initial space station has been successfully placed into orbit and that the operations of that satellite fully conform to the terms and conditions of the space station system authorization.

We have recently undertaken a review of our records of FCC filings for another purpose and discovered that we do not have a record of submitting the certification required by Section 25.121(d)(2). This certification determines the date on which the fifteen (formerly ten) year non-geostationary satellite constellation license term begins.

Uncertainty about the meaning of the phrase "the operations of that satellite fully conform to the terms and conditions of the space station system authorization" may have led to a failure to make the certification. The FCC authorization for the Globalstar System was not specific about terms and conditions but rather incorporated by reference "the technical specifications set forth in [Globalstar's] application and consistent with our rules unless specifically waived herein."¹ Under our construction contract with Space Systems/Loral, Inc., the satellites were not formally accepted by Globalstar until the in-orbit testing of at least twenty-four satellites was completed. This occurred in June 1999. Globalstar did not place the constellation into commercial service until late-1999 when thirty-two satellites had been launched and tested, because thirty-two satellites were the minimum needed to provide an acceptable quality of service to paying customers.

¹ *Loral/Qualcomm Partnership, L.P.*, Order and Authorization, DA 95-128, 10 FCC Rcd 2333 (Jan. 31, 1995), ¶ 24.

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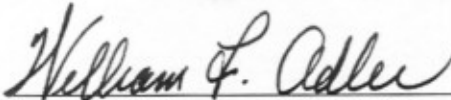
In any event, in light of the language of Section 25.121(d)(2), and in order to cure the apparent absence of an unambiguous license term initiation date, Globalstar hereby certifies that its first four satellites, launched together on February 14, 1998, began to operate in conformance with the terms and conditions of the authorization on April 21, 1998, the date on which Globalstar determined that these four satellites met the technical specifications of the satellite construction contract. Pursuant to Section 25.121(d)(2), Globalstar's operating authority for the 1.6/2.4 GHz Mobile-Satellite System will expire on April 20, 2013.

We sincerely regret any confusion that our possible failure to certify the beginning of the license term may have caused. Please contact the undersigned if you have any questions or require any additional information.

Respectfully submitted,

GLOBALSTAR, INC.

By:



William F. Adler

Vice President-Legal & Regulatory Affairs

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cc: Robert Nelson
Karl Kensinger