

LAWLER, METZGER, KEENEY & LOGAN, LLC

1717 K STREET, NW
SUITE 1075
WASHINGTON, D.C. 20006

STEPHEN J. BERMAN

PHONE (202) 777-7700
FACSIMILE (202) 777-7763

November 2, 2020

Via Electronic Filing

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

Re: AST&Science Application – File Nos. SAT-PDR-20200413-00034, SAT-APL-20200727-00088, & SAT-APL-20201028-00126

Dear Ms. Dortch:

Globalstar, Inc. (“Globalstar”), through its attorneys, hereby responds to the Public Notice for the above-captioned AST&Science LLC (“AST”) application requesting U.S. market access for the proposed SpaceMobile satellite system (the “AST Application”).¹ In its application, AST stated that its network’s TT&C receive and transmit operations would be “in the S band” and that these beams would be “used only outside of the U.S.”² AST further indicated in its application that its satellites would be capable of transmitting TT&C signals in the 2483.5-2500 MHz band segment, among other bands.³

Globalstar is authorized in the United States and around the world to provide mobile satellite service (“MSS”) from its constellation of satellites transmitting in its Big LEO service downlink spectrum at 2483.5-2500 MHz.⁴ Globalstar strongly opposes any potential use of its

¹ See Satellite Policy Branch Information, Space Station Applications Accepted for Filing, Report No. SAT-01501 (Oct. 2, 2020).

² AST&Science LLC Petition for Declaratory Ruling Granting Access to the U.S. Market for a Non-U.S.-Licensed Non-Geostationary Orbit Satellite Constellation, Call Sign S3065, IBFS File No. SAT-PDR-20200413-00034, Attachment A at 4 (filed Apr. 13, 2020)

³ *Id.* at 3.

⁴ 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 Red 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*,

Ms. Marlene Dortch

November 2, 2020

Page 2

licensed Big LEO MSS spectrum by AST for TT&C operations. In response to AST's application, Globalstar in April 2020 corresponded with AST regarding its TT&C proposal. By letter, AST communicated to Globalstar that it would only use the 2025-2110 MHz and 2200-2290 MHz bands for back-up TT&C operations, and that these transmissions would only occur outside the United States. Based on these statements, Globalstar understands that AST does not seek authority for TT&C operations in its licensed MSS spectrum at 2483.5-2500 MHz.

Please direct any questions regarding this response to the undersigned

Respectfully submitted,

/s/ Stephen J. Berman

Stephen J. Berman

Counsel for Globalstar, Inc.

cc: Sallye Clark and Laura Stefani, Mintz Levin,
Counsel for AST&Science

CERTIFICATE OF SERVICE

I, Stephen J. Berman, hereby certify that, on this second day of November 2020, a copy of the foregoing letter was served by electronic mail upon:

Sallye Clark
SClark@mintz.com
Laura Stefani
LStefani@mintz.com
Mintz, Levin, Cohn, Ferris, Glovsky and Popeo,
P.C.
Counsel for AST&Science LLC

/s/ Stephen J. Berman