



Federal Communications Commission  
Washington, DC 20554

International Bureau

May 25, 2007

**S2115**      **SAT-AMD-20050105-00003**  
Globalstar, Inc.

**IB2005000019**

**S2115**      **SAT-MOD-19960308-00044**  
L/Q Licensee, Inc.  
S2115

**S2115**      **SAT-MOD-20030606-00098**  
Globalstar, Inc.  
Globalstar

**IB2003001050**

William Adler  
Vice President and Assistant Secretary  
Globalstar, Inc.  
461 So. Milpitas Blvd.  
Milpitas, CA 95035

Re: Call Sign S2115

Dear Mr. Adler:

Thank you for the information provided concerning the status of the Globalstar constellation in your November 20, 2006 letter to John Giusti, as well as in your February 20, 2007 briefing and subsequent February 28, 2007 email to International Bureau staff. Based upon the information provided, it is our understanding that Globalstar has modified the configuration of its constellation, such that its eight authorized planes no longer consist of five operational satellites evenly spaced satellites within the plane. It is our understanding that these changes were made following technical difficulties with a significant number of the Globalstar satellites and were designed to maintain continuity of service to consumers to the greatest extent possible. Accordingly, Globalstar should seek authorization for the modification to its constellation.

Based upon Globalstar's November 20 certification and subsequent discussions, it is our understanding that Globalstar believes that certain technical parameters are not a binding part of its authorization. These parameters include spacing between satellites, and possibly also the number of in-orbit spares, the number of in-orbit test bed satellites, and the number of operating satellites.

Technical specifications relied upon in granting authority and incorporated in the grant of authority are a material part of the authorization. Globalstar's authorization is specifically premised upon the "terms, conditions, and technical specifications set forth" in its application for authority. Any changes in operations inconsistent with this limitation must be undertaken pursuant to authorization under Title III of the Communications Act.

In addition, because the replacement satellites would not be launched into an authorized orbital configuration, we do not consider the certification filed on November 20 to be for "technically identical" satellites, and therefore, do not consider it to be effective.

Globalstar should file appropriate applications for modification of its license and/or special temporary authority in connection with the current and contemplated future configuration of its constellation. In the event that material terms of the Globalstar

authorization would constrain Globalstar's ability to react expeditiously to technical issues that may affect consumer service, we would consider specific proposals for modifying the material terms of the authorization to eliminate or modify those terms.

Further, any action taken on any application for modification or special temporary authority is without prejudice to any enforcement action the Commission may deem appropriate. Please feel free to contact me or Karl Kensinger of my staff should you have any questions.

Sincerely,

Handwritten signature of Casandra C. Thomas in cursive script.

Robert G. Nelson  
Chief, Satellite Division

Handwritten initials 'for' in cursive script.