

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Iridium Satellite LLC)	File Nos. SAT-MOD-19961204-00139,
)	SAT-AMD-20050816-00160, and
Application to Modify the Iridium)	SAT-AMD-20051118-00236
Mobile-Satellite Service Space Station)	
License to Include Operating Authority for)	
Aeronautical Mobile-Satellite (Route) Service)	

COMMENTS OF GLOBALSTAR, INC.

Globalstar, Inc. (“Globalstar”) hereby comments on Iridium’s December 13, 2011 supplement (“December 13 Supplement”) to its above-captioned application to modify its space station license to include operating authority for Aeronautical Mobile Satellite (Route) Service (“AMS(R)S”).¹ In 2006, the Federal Communications Commission (“Commission”) sought and received substantial comment on issues relating to priority and preemptive access for AMS(R)S operations in the Big LEO band and other satellite bands.² The Commission should not grant the

¹ Letter from Donna Bethea Murphy, Vice President Regulatory Engineering, Iridium, to Marlene H. Dortch, Secretary, FCC, File Nos. SAT-MOD-19961204-00139, SAT-AMD-20050816-00160, and SAT-AMD-20051118-00236 (Dec. 13, 2011) (“December 13 Supplement”). See Public Notice, Satellite Space Applications Accepted for Filing, Report No. SAT-00828 (rel. Dec. 16, 2011).

² *Review of Part 87 of the Commission’s Rules Concerning the Aviation Radio Service*, Second Report and Order and Second Further Notice of Proposed Rule Making, 21 FCC Rcd 11582, ¶ 32 (2006). In June 2010, the Commission stated that it was transferring the record on these AMS(R)S issues from its Part 87 rulemaking (WT Docket No. 01-289) to its pending rulemaking proceeding regarding the Aeronautical Mobile Satellite Service (“AMSS”) (IB Docket No. 05-20), which encompasses AMS(R)S. See *Review of Part 87 of the Commission’s Rules Concerning the Aviation Radio Service*, Third Report and Order, 25 FCC Rcd 7610, ¶ 1 n.4 (2010) (referencing *Service Rules and Procedures to Govern the Use of Aeronautical Mobile Satellite Service Earth Stations in Frequency Bands Allocated to the Fixed Satellite Service*, Notice of Proposed Rule Making, 20 FCC Rcd 2906 (2005)).

request Iridium made in its December 13 Supplement unless and until it resolves these priority and preemptive access issues in a manner that maintains the integrity of existing MSS offerings in the Big LEO band.³

The Big LEO band is substantially different from the MSS L band, where AMS(R)S was previously authorized and priority and preemptive access rules are already applicable.⁴ Big LEO frequencies are subject to extensive coordination requirements to prevent interference among multiple providers. Specifically, under the existing rules for the Big LEO band, Iridium and Globalstar are required to coordinate their use of the shared portion of the band (1617.775-1618.725 MHz), and are subject to inter-service coordination requirements designed to protect radioastronomy and radionavigation. Any priority and preemptive access requirements applied to the Big LEO band should not override the critical coordination and interference rules and standards for this spectrum.

If Iridium's AMS(R)S operations were given priority or preemptive access in the Big LEO band without limits or regard for the existing coordination regime in the band, Iridium might attempt to monopolize the shared Big LEO spectrum for AMS(R)S use. This outcome would inappropriately elevate the status of AMS(R)S over all other MSS public safety services. It also could frustrate Globalstar's efforts to meet the vital needs of first responders and other public safety customers during times of emergency when they too require immediate access to an

³ See, e.g., Reply Comments of Globalstar, Inc., WT Docket No. 01-289, at 4-8 (Apr. 5, 2007).

⁴ The priority and preemptive access requirements for the MSS L band are contained in US Footnote 308 to section 2.106 of the Commission's rules. 47 C.F.R. § 2.106.

available channel. Certainly, AMS(R)S should not be implemented in the Big LEO band if those operations will threaten the integrity of other MSS offerings in that spectrum.⁵

At a minimum, to protect the existing Big LEO spectrum framework, any grant of Iridium's application for AMS(R)S authority should contain an explicit condition similar to that included in the Commission's 2001 grant of authority to Boeing in the 2 GHz MSS band.⁶ Specifically, any Commission grant should state explicitly that Iridium's AMS(R)S authority in the Big LEO band shall not give Iridium's system any status superior to any other MSS system in the Big LEO band, including Globalstar's. Globalstar notes that, going forward, Iridium's AMS(R)S system would not only have to comply with the existing domestic coordination and interference protection regime in the Big LEO band, but would also have to meet all applicable international coordination requirements in this band.

Respectfully submitted,

/s/ Regina M. Keeney

L. Barbee Ponder IV
General Counsel & Vice President
Regulatory Affairs
Globalstar, Inc.
300 Holiday Square Blvd
Covington, LA 70433

Regina M. Keeney
Stephen J. Berman
Lawler, Metzger, Keeney & Logan, LLC
2001 K Street NW, Suite 802
Washington, DC 20006
(202) 777-7700

Counsel for Globalstar, Inc.

January 11, 2012

⁵ AMS(R)S operations in this band could also lead to interference to adjacent-spectrum radionavigation and radioastronomy services.

⁶ *Application of The Boeing Company Concerning Use of the 1990-2025/2165-2200 MHz and Associated Frequency Bands for a Mobile-Satellite System*, Order and Authorization, 16 FCC Rcd 13691, ¶¶ 39, 44 (IB 2001).

Certificate of Service

I hereby certify that on this 11th day of January, 2012, I caused true and correct copies of the foregoing Comments of Globalstar, Inc. to be mailed by U.S. mail, postage prepaid, to:

Jennifer D. Hindin
Wiley Rein
1776 K Street NW
Washington, DC 20006
Counsel to Iridium Satellite LLC

Donna Bethel Murphy
Vice President Regulatory Engineering
Iridium Satellite LLC
1750 Tysons Blvd., Suite 1400
McLean, VA 22102

/s/ Ruth E. Holder
Ruth E. Holder