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May 28, 2003

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Via Hand Delivery

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
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Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

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Policy Branch  
International Bureau

Re: File Nos. 183/184/185/186-SAT-P/LA-97; 182-SAT-P/LA-97(64)  
IBFS Nos. SAT-LOA-19970926-00151/52/53/54; SAT-LOA-19970926-00156;  
SAT-AMD-20001103-00154; SAT-MOD-20020717-00116/17/18/19; SAT-  
MOD-20020722-00107/08/09/10/12  
Call Signs: S2320, S2321, S2322, S2323, S2324

Dear Ms. Dortch:

Pursuant to Section 1.65 of the Commission's rules, New Globalstar Corporation ("New Globalstar") hereby submits additional information to update the record regarding the above-referenced cancelled authorization of Globalstar, L.P., Debtor-in-Possession to construct, launch, and operate a mobile satellite service ("MSS") system in the 1990-2025 and 2165-2200 MHz ("2 GHz") bands.<sup>1</sup> Specifically, New Globalstar seeks to update the record to reflect the substitution of New Globalstar for GLP, as the holder of all interests in the cancelled 2 GHz MSS license, following consummation of the court-approved bankruptcy sale of GLP's assets to New Globalstar and Commission approval of the assignment or transfer of control of the associated authorizations.

Pursuant to a Memorandum Opinion and Order, issued January 30, 2003, the International Bureau declared GLP's 2 GHz MSS license null and void for failure to meet the

<sup>1</sup> See *Globalstar, L.P.*, Order and Authorization, 16 FCC Rcd 13739 (IB/OET 2001) ("2 GHz MSS License"). On April 1, 2002, the Commission approved the *pro forma* assignment of the 2 GHz license from Globalstar LP to Globalstar LP, Debtor-in-Possession. For ease of reference, Globalstar L.P. or Globalstar L.P., Debtor-in-Possession will be referred to hereinafter as "GLP."

# MORRISON & FOERSTER LLP

Ms. Marlene H. Dortch  
Federal Communications Commission  
May 28, 2003  
Page Two

first milestone.<sup>2</sup> GLP subsequently filed an application for review and request for stay of the *MO&O*, both of which are pending before the Commission.

On April 25, 2003, the U.S. Bankruptcy Court in Delaware approved the sale of GLP's assets to a new company (i.e., New Globalstar) to be controlled by ICO Global Communications (Holdings) Limited ("ICO"). To implement the court-approved sale, GLP, certain of its subsidiaries, and ICO executed an Investment Agreement, dated as of May 19, 2003 ("Investment Agreement").

The proposed transaction will occur in two stages. In the first stage, pursuant to the Investment Agreement and subject to Commission approval, GLP and its three debtor subsidiaries will contribute substantially all of their assets to New Globalstar in exchange for 1) shares of Class A common stock, representing 46 percent of the equity interests and 20 percent of the voting interests in New Globalstar ("Class A Shares"); and 2) New Globalstar's assumption of certain liabilities and obligations of GLP and its subsidiaries. In exchange for a total payment of \$55 million to New Globalstar, ICO will receive shares of Class B common stock, representing 54 percent of the equity interests and 80 percent of the voting interests in New Globalstar. In the second stage, which is expected to close soon after the first stage, the Class A Shares will be ultimately transferred from GLP to the creditors ("GLP Creditors") in proportion to the value of their allowed claims against the estate and in accordance with a plan of reorganization to be confirmed by the Bankruptcy Court.<sup>3</sup>

To obtain Commission approval of the proposed transaction, the parties have filed five applications seeking consent to the assignment or transfer of control of authorizations relating to the operation of the existing Globalstar MSS system from GLP or its affiliate to New Globalstar.<sup>4</sup>

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<sup>2</sup> See *Globalstar, L.P.*, Memorandum Opinion and Order, 18 FCC Rcd 1249 (IB 2003).

<sup>3</sup> The precise identity of the GLP Creditors and the amount of their Class A Shares has not yet been determined, but the Applicants anticipate that the Bankruptcy Court will do so in the next several months when it affirms the plan of reorganization.

<sup>4</sup> The authorizations involved in these five applications are: (1) Big LEO space station license (Call Sign S2115; File Nos. 19-DSS-P-91(48), CSS-91-014), granted to Loral/Qualcomm Partnership, L.P. ("LQP"), the sole general partner of the managing partner of GLP, and subsequently assigned to L/Q Licensee, Inc., a wholly owned subsidiary of LQP; (2) five Clifton, Texas gateway earth station licenses (Call Signs E970199, E000342, E000343, E000344, and E000345; File Nos. SES-LIC-19970310-00343, SES-LIC-20000706-01091, SES-LIC-20000706-01092, SES-LIC-20000706-01093, and SES-LIC-20000706-01094), held by Globalstar USA, LLC ("GUSA"), a wholly owned subsidiary of Globalstar Corporation ("GC"), which in turn is a wholly owned subsidiary of GLP; (3) three Cabo Rojo, Puerto Rico gateway

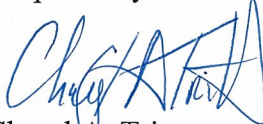
*(Footnote Continued)*

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Ms. Marlene H. Dortch  
Federal Communications Commission  
May 28, 2003  
Page Three

Please direct all correspondence or inquiries regarding this matter to the undersigned.

Respectfully submitted,



Cheryl A. Tritt  
Counsel for New Globalstar Corporation

cc: T. Tycz  
J. Ball

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earth station licenses (Call Signs E990335, E990336, and E990337; File Nos. SES-LIC-19990809-01349, SES-LIC-19990809-01350, and SES-LIC-19990809-01351), held by Globalstar Caribbean Ltd., a wholly owned subsidiary of subsidiary of GC, which in turn is a wholly owned subsidiary of GLP; (4) a blanket mobile earth terminal license (Call Sign E970381; File Nos. SES-LIC-19970710-00928 and 1367-DSE-P/L-97, as modified on May 13, 2003, File No. SES-MOD-20021010-01758), held by GUSA; and (5) three international Section 214 authorizations (File Nos. ITC-214-19990728-00484, ITC-214-19991229-00795, and ITC-214-20000615-00356), held by GUSA.