Globalstar

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Mr. John Giusti, Acting Chief
International Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: **CERTIFICATION PURSUANT TO 47 C.F.R. § 25.143(c)**
Call Sign S2115 - Globalstar 1.6/2.4 GHz Mobile-Satellite System
File Nos. SAT-AMD-20050105-00003 and SAT-MOD-20030606-00098

Dear Mr. Guisti:

Pursuant to Sections 25.143(c) and (d) of the Commission's Rules, 47 C.F.R. § 25.143(c) & (d), Globalstar Licensee LLC and its parent company, Globalstar, Inc. (collectively, "Globalstar"), hereby certify to the Commission that they intend: (1) to launch eight space stations into the Globalstar satellite constellation that are technically identical to the existing space stations; and (2) in connection therewith, to adjust the constellation to change the number of operating satellites, the number of in-orbit spares and the number of in-orbit test bed satellites and the relative positions of the satellites within the authorized orbital planes. These changes will not cause the Globalstar nongeostationary ("NGSO") satellite constellation to exceed the total number of authorized operating space stations within the meaning of Sections 25.143(c) and (d) of the Rules.[1] The orbital parameters will remain the same as those previously authorized, and all existing in-orbit satellites will remain in their planes.

In its Annual Report, filed on October 6, 2006 pursuant to Section 25.143(e) of the Rules, Globalstar reported that as its satellites approached the end of their design life, they had begun or would eventually begin to exhibit a degree of reduced call capacity attributable to degrading S-band antenna amplifiers. Globalstar stated that it would be able to ameliorate this performance shortcoming by launching its eight on-ground spares and making adjustments to its constellation configuration in advance and in support of the launch of the spares.

Globalstar's launch contractor, Starsem, has recently provided tentative launch windows of March 26 – April 24 and May 14 – June 12, 2007, for the two launches of four spares each. In order to prepare the constellation for placement of the eight spares in the optimal slots, Globalstar must begin drifting certain of the existing operational and temporarily out-of-service satellites into different locations in their planes. The repositioning will take two to three months.

To maintain the highest possible capacity and best possible quality of service, Globalstar will modify its current 40-satellite Walker NGSO configuration. The constellation will combine

[1] Globalstar is currently authorized to operate 40 in-orbit space stations plus spares. Public Notice Rpt. No. SAT-00270, DA 05-316 (Feb. 5, 2005).

two different Walker configurations but will remain a single operating constellation of forty satellites plus in-orbit spares. The modified constellation does not reduce the system's worldwide coverage and meets all requirements of Section 25.143(b)(2) the Commission's rules for the 1.6/2.4 GHz MSS service as well as the approved orbital debris mitigation plan. Subscriber service will continue, and there will be no reduction in geographic coverage during the transition to the modified configuration. The modified constellation will not increase interference to other services and will meet all requirements of Section 25.213 of the Rules. There will be no change in operations of the satellites, gateway earth stations or mobile earth terminals.

The modified constellation will accommodate sharing of spectrum with other NGSO systems in the feeder links as the current configuration does today.[2] Sharing the service links with other CDMA systems, if required, will be accomplished just as easily as with the current configuration. The techniques that exist to mitigate interference between multiple NGSO systems can still be applied as can the parameters that allow multiple CDMA systems to coordinate with one another. Such interference mitigation techniques and parameters include polarization diversity, spread spectrum, power control, downlink power flux density, aggregate uplink EIRP spectral density and satellite diversity, which allows links between users and/or gateways to be established through one or more satellites.

As the launch dates approach, Globalstar will determine the precise positions for the eight new satellites. It is presently contemplated that two will be placed in each of Planes C, F and H and that one will be placed in each of planes D and E.[3] Satellites that are replaced in the operating constellation by newly-launched satellites will be kept as in-plane spares, and failed satellites, if any, will be moved from the orbital altitude in accordance with the approved orbital debris mitigation plan.

Please contact the undersigned if you have any questions or require additional information.

Respectfully submitted,

GLOBALSTAR LICENSEE LLC &
GLOBALSTAR, INC.

By: William F. Adler

William F. Adler
Vice President & Assistant Secretary

[2] Globalstar and ICO Global have entered into a feeder link frequency coordination agreement that is effective through 2007.

[3] The Right Ascension of the Ascending Node (RAAN) and argument of perigee (ARGP) for the eight planes were provided in File No. SAT-MOD-20030606-00098, Exhibit A, p. 5 of 7, filed June 3, 2003.