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Federal Communications Commission
Office of Secretary

Via Hand Delivery
Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Globalstar LLC
Application for Authority to Implement an Ancillary Terrestrial Component
File Nos. SAT-MOD-20050301-00054; SES-MOD-20050301-00261

Dear Ms. Dortch:

Mobile Satellite Ventures Subsidiary LLC ("MSV") urges the International Bureau ("Bureau") in acting on the above-captioned application to clarify that Globalstar LLC ("Globalstar") requires additional authority from the Commission if it seeks to provide a poorer quality satellite service than that for which it has authority today.

In the above-captioned proceeding, Globalstar is seeking authority to implement an Ancillary Terrestrial Component ("ATC") in conjunction with its current-generation Big LEO Mobile Satellite Service ("MSS") system.¹ One precondition for authority to implement ATC is a showing that the applicant will provide an "integrated service." 47 C.F.R. § 25.149(b)(4). The safe harbor for satisfying the integrated service requirement is to offer a dual-mode handset that can communicate with both the satellite and terrestrial network. 47 C.F.R. § 25.149(b)(4)(i). In its application, Globalstar certifies that it will offer a dual-mode handset. *See Globalstar ATC Application* at Exhibit B-4.

Globalstar states in its application that it has not yet concluded the design or production of the user equipment it expects to deploy for its proposed service. *See Globalstar ATC Application* at Exhibit B-4. The application does, however, specify the output power (EIRP) and antenna gain of the user equipment. *Id.* Moreover, based on its existing satellite license, Globalstar is authorized to provide satellite service at an average data rate of no less than 2.4 kbps.² If there is any reduction in the size and weight of its pictured user equipment, these key

¹ See Application of Globalstar LLC, File Nos. SAT-MOD-20050301-00054; SES-MOD-20050301-00261 (March 1, 2005) ("*Globalstar ATC Application*").

² See *Loral/Qualcomm, L.P., Authority to Construct, Launch and Operate Globalstar, Order and Authorization*, 10 FCC Rcd 2333, ¶ 24 (Int'l Bur. 1995). Globalstar's application was granted "in accordance with the technical specifications set forth in its application," meaning that Globalstar cannot offer consumers satellite service at a lesser data rate without seeking prior

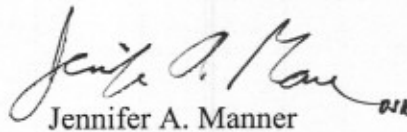
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parameters (EIRP, antenna gain, and data rate) are likely to change in ways that would affect the quality of the satellite service.³ As such, in acting on Globalstar's application, the Bureau should clarify that Globalstar must seek prior approval to the extent it modifies these parameters and, if Globalstar modifies these parameters, the Bureau also should require Globalstar to specify the services that it plans to offer on ATC.

Please direct any questions regarding this matter to the undersigned.

Very truly yours,


Jennifer A. Manner

cc: Don Abelson
Cassandra Thomas
Howard Griboff
William Bell
William Adler
William Lake

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Commission approval. *See* Application of Loral/Qualcomm Partnership, L.P. For Authority to Construct, Launch, and Operate Globalstar, File No. SAT-AMD-19941116-00077 (November 15, 1994), at Tables 4-2 to 4-5.

³ For this reason, MSV received authority to operate a link margin booster with dual-mode handsets used with its current-generation MSS system. *See Mobile Satellite Ventures Subsidiary LLC, Order and Authorization*, DA 04-3553 (Int'l Bur. 2004), at ¶¶ 28-33.