

June 24, 2008

William T. Lake

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

FILED/ACCEPTED

JUN 24 2008

Federal Communications Commission  
Office of the Secretary

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Re: **FCC File No. SAT-MOD-20080516-00106**  
**MOTION FOR LEAVE TO FILE CONSOLIDATED OPPOSITION**

Dear Ms. Dortch:

On May 16, 2008, Globalstar Licensee LLC ("Globalstar") filed an application in the above-referenced proceeding seeking modification of its Ancillary Terrestrial Component ("ATC") authority.<sup>1/</sup> On May 23, 2008, the International Bureau placed the *Modification Application* out for comment,<sup>2/</sup> and pursuant to section 25.154 of the Commission's rules, 47 C.F.R. § 25.154, petitions to deny the *Modification Application* were due to be filed no later than June 23, 2008.

On June 23, 2008, Globalstar was served by email with pleadings filed by Iridium Satellite LLC and the U.S. GPS Industry. In addition, Globalstar has been informed that at least one party (Sprint Nextel Corporation) and potentially others have filed petitions to deny the *Modification Application* and served them upon Globalstar by mail. Ordinarily, Globalstar's opposition to these petitions would be due no later than July 3, 2008,<sup>3/</sup> however, section 1.4(h) of the Commission's rules provides that "[i]f a document is required to be served upon other parties by statute or Commission regulation and the document is in fact served by mail ... and the filing period for a response is 10 days or less, an additional 3 days (excluding holidays) will be allowed to all parties in the proceeding for filing a response."<sup>4/</sup> Accordingly, Globalstar's opposition to any petitions to deny the *Modification Application* served on it by mail is not due until July 9, 2008.

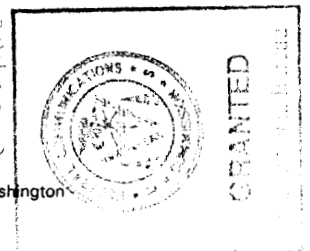
<sup>1/</sup> Globalstar Licensee LLC – Application for Modification of Authority To Operate Ancillary Terrestrial Component Authorities in the 1.6/2.4 GHz Bands (Call Sign S2115) (filed May 16, 2008) ("*Modification Application*").

<sup>2/</sup> See Public Notice - Report No. SAT-00525, Policy Branch Information, "Satellite Space Station Applications Accepted for Filing" (rel. May 23, 2008).

<sup>3/</sup> See 47 C.F.R. 25.154(c).

<sup>4/</sup> See 47 C.F.R. § 1.4(h).

File #	Grant Date	Term Dates
	7/8/08	
Call Sign (or other identifier)	To:	From:
Approved:	Policy Branch Chief	



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In order to avoid the need to file multiple oppositions to the petitions to deny the *Modification Application*, Globalstar hereby requests leave to file a consolidated opposition to the pleadings submitted in this proceeding no later than July 9, 2008, the date on which its opposition to the petitions served on it by mail is due. See 47 C.F.R. § 1.4(h). Establishment of a consolidated reply date will not harm any party to this proceeding and will serve the public interest by avoiding the need for Globalstar to file, and the Bureau to consider, repetitive pleadings responding to the petitions. Globalstar has conferred with counsel for Iridium and the U.S. GPS Industry Council and they have informed Globalstar that they do not object to this request.

Respectfully submitted,



William T. Lake

*Counsel to Globalstar Licensee LLC*

cc: Robert Nelson  
Andrea Kelly  
William Bell  
Jennifer Hindin  
Philip Bonomo  
Regina Keeney