

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

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|----------------------------------------|---|------------------------|
| In the Matter of                       | ) |                        |
|                                        | ) |                        |
| Globalstar Licensee LLC                | ) | File No. SAT-MOD-_____ |
|                                        | ) |                        |
| Application to Modify Authorization to | ) | Call Sign S2115        |
| Extend License Term for NGSO Space     | ) |                        |
| Station License                        | ) |                        |

**APPLICATION OF GLOBALSTAR LICENSEE LLC TO MODIFY AUTHORIZATION  
TO EXTEND THE LICENSE TERM OF NGSO SPACE STATION LICENSE**

Globalstar Licensee LLC (“Globalstar”), pursuant to Section 25.117 of the Federal Communications Commission’s (“Commission’s”) rules,<sup>1</sup> hereby requests an extension of the license term for its non-geostationary mobile satellite service (“NGSO MSS”) constellation (Call Sign S2115) to October 4, 2024. With a grant of the proposed extension, Globalstar will be able to operate its existing first-generation satellites beyond the April 21, 2013 expiration date for its NGSO space station license. This proposed license modification is consistent with Commission precedent and will further the public interest, facilitating Globalstar’s continued provision of safety-of-life services to consumers, public safety personnel, and other customers in the United States and elsewhere.

**I. GLOBALSTAR’S MSS BUSINESS AND ITS FIRST-GENERATION NGSO CONSTELLATION**

*Globalstar’s MSS network.* Globalstar is a leading provider of global mobile satellite voice and data services. On January 31, 1995, the Commission authorized Globalstar to construct, launch, and operate a “Big LEO” MSS system, and Globalstar initiated commercial

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<sup>1</sup> 47 C.F.R. § 25.117.

service in 2000.<sup>2</sup> Globalstar is licensed for uplink transmissions (mobile earth stations to satellites) in the Lower Big LEO band at 1610-1618.725 MHz, and for downlink transmissions (satellites to mobile earth stations) in the Upper Big LEO band at 2483.5-2500 MHz.<sup>3</sup> Having invested over \$5 billion to develop its global NGSO MSS network, Globalstar today uses its constellation of satellites and 24 ground stations on six continents to provide affordable, high-quality MSS to more than 550,000 customers in over 120 countries around the world. Globalstar is dedicated to providing mission-critical, emergency, and safety-of-life satellite services to consumers, public safety personnel, businesses, and other customers in remote, unserved, and underserved areas not reached by terrestrial deployments.<sup>4</sup>

*First-generation satellites and services.* Globalstar launched the majority of its first-generation Big LEO satellites in the late 1990s. In early 2007, these satellites suffered an unanticipated degradation of their downlink capability in the Upper Big LEO band, temporarily precluding consistently reliable duplex voice and data services over Globalstar's network. (This degradation does not adversely affect Globalstar's one-way simplex and "SPOT" services, which use only the uplink band from a subscriber's equipment to Globalstar's satellites.) In response to this technical problem, Globalstar launched eight additional first-generation satellites in May and October 2007 to provide support for its duplex, simplex and SPOT services.

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<sup>2</sup> *Application of Loral/Qualcomm Partnership, L.P. For Authority to Construct, Launch, and Operate Globalstar, a Low Earth Orbit Satellite System to Provide Mobile Satellite Services in the 1610-1626.5 MHz/2483.5-2500 MHz Bands, Order and Authorization, 10 FCC Rcd 2333 (IB 1995) ("Globalstar Authroiztion Order").*

<sup>3</sup> Iridium is authorized to share spectrum with Globalstar at 1617.775-1618.725 MHz.

<sup>4</sup> In populated areas, Globalstar's MSS network provides critical back-up capabilities for public safety personnel during disasters when terrestrial facilities can be rendered unavailable. Public safety entities involved in relief efforts in the United States and around the world have relied on Globalstar's satellite services after earthquakes, hurricanes, and other disasters.

Given its limited duplex capabilities, Globalstar has in recent years focused on the development of affordable, consumer-oriented simplex devices and services with significant public safety benefits.<sup>5</sup> Most notably, Globalstar's innovative "SPOT" family of MSS devices has played a critical role in the provision of emergency and safety-of-life services to individual consumers beyond terrestrial wireless reach. From any location in Globalstar's global MSS footprint, SPOT devices can transmit a user's GPS coordinates and status updates to any e-mail, handheld device, or smartphone address in the world. As of February 4, 2013, the family of SPOT devices has been used to achieve 2,219 emergency rescues, often life saving, in seventy-nine countries and at sea.

*Launch of second-generation constellation.* On February 6, 2013, Globalstar completed the series of launches for its second-generation MSS constellation, which is licensed by the Republic of France.<sup>6</sup> Once fully operational, Globalstar's second-generation MSS system will support highly reliable, crystal-clear CDMA-quality voice and data satellite services to the more than five billion consumers, public safety users, and other potential customers located within its global footprint. In offering an array of services to customers throughout the world, Globalstar's

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<sup>5</sup> In addition to individual consumers, Globalstar's current MSS customers include entities in government, the military, emergency preparedness, transportation, heavy construction, oil and gas, mining, forestry, and commercial fishing. For government and business customers, Globalstar's data solutions are ideal for asset and personal tracking, data monitoring, and supervisory control and data acquisition applications.

<sup>6</sup> Press Release, Globalstar, Inc., *Mission Accomplished! Globalstar Announces Successful Fourth Launch of Six Second-Generation Satellites* (Feb. 6, 2013), available at: <<http://www.globalstar.com/en/index.php?cid=7010&pressId=764>>. In March 2011, the Commission modified fixed and mobile earth station licenses held by GUSA Licensee LLC to permit those earth station facilities to communicate with Globalstar's French-licensed second-generation Big LEO satellite system. See *Globalstar Licensee LLC; Application for Modification of Non-geostationary Mobile Satellite Service Space Station License; GUSA Licensee LLC; Applications for Modification of Mobile Satellite Service Earth Station Licenses; GCL Licensee LLC; Applications for Modification of Mobile Satellite Service Earth Station Licenses*, Order, 26 FCC Rcd 3948 (2011).

satellite network will provide the highest voice quality, fastest truly mobile data speeds, and most affordable service in the MSS industry.

## **II. GRANT OF THE REQUESTED LICENSE TERM EXTENSION WILL FURTHER THE PUBLIC INTEREST AND IS CONSISTENT WITH COMMISSION PRECEDENT**

The space station authorization for Globalstar's first-generation NGSO MSS constellation is scheduled to expire on April 21, 2013.<sup>7</sup> More than twenty of Globalstar's first-generation satellites, however, continue to operate today and will be able to operate beyond this expiration date.<sup>8</sup> In fact, Globalstar expects that most of the first-generation satellites launched in 2007 will be able to operate years into the future. Accordingly, Globalstar requests that the Commission modify its first-generation space station license by extending the license term for these satellites to October 4, 2024, which is the expiration date for Globalstar's blanket authorization for its mobile earth station operations.<sup>9</sup>

The requested modification<sup>10</sup> of Globalstar's NGSO space station license will further the public interest. Continued operation of its first-generation satellites will allow Globalstar to

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<sup>7</sup> See 47 C.F.R. § 25.121. Under this provision, a space station "license term will begin at 3 a.m. EST on the date that the licensee certifies to the Commission that its initial space station has been successfully placed into orbit and that the operations of that satellite fully conform to the terms and conditions of the space station system authorization." Globalstar filed this certification with the Commission in April 1998.

<sup>8</sup> See Globalstar Licensee LLC, Annual Report for Call Sign S2115 (Sep. 30, 2012) ("Globalstar 2012 Annual Report").

<sup>9</sup> See Call Sign E970381, File No. SES-MOD-20110303-00241, Public Notice, Report No. SES-01370 (Aug. 3, 2011) (authorizing mobile earth station communications with both Globalstar's first-generation Big LEO constellation and its second-generation French-licensed constellation).

<sup>10</sup> Globalstar's proposed license modification under Section 25.117 rather the renewal process under Section 25.121(e) is the appropriate regulatory mechanism for permitting continued operation of Globalstar's first-generation satellites. 47 C.F.R. § 25.117. The Commission has previously extended a number of space station license terms through its license modification process, including the license term for Orbcomm, Inc.'s NGSO MSS constellation.

maintain its existing MSS capabilities and fully serve its growing customer base around the world. In particular, continued operation of these satellites will help Globalstar to dedicate sufficient capacity to its expanding safety-of-life SPOT services and other mission-critical simplex offerings that it provides to consumers, public safety, and other customers beyond the reach of terrestrial deployments. Grant of the requested extension will also promote the efficient use of spectrum and orbital resources by enabling Globalstar’s first-generation satellites to operate likely to the end of their operational lives, rather than forcing the premature decommissioning of these orbital facilities. To this end, the Commission has previously acknowledged that Big LEO satellites might be capable of operating beyond their license expiration dates and indicated that it would work to accommodate the continued operation of those satellites.<sup>11</sup>

Extension of Globalstar’s first-generation license term is also consistent with Commission precedent. In response to an analogous request, the Commission in 2008 granted a fifteen-year extension of Orbcomm’s space station license for its NGSO MSS constellation.<sup>12</sup> The Commission explained that this license modification would “permit continued operations of

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*See Applications by Orbcomm License Corp. for Authority to Modify its Non-Voice, Non-Geostationary Satellite System, Order and Authorization, 23 FCC Rcd 4804 (IB 2008) (“Orbcomm Order”). See also See Intelsat Licensee LLC, Stamp Grant, SAT-MOD-20120320-00057 (Sep. 27, 2012) (“Intelsat Extension Grant”) (extending license term for Galaxy 25 satellite by four and a half years); XM Radio Inc., Stamp Grant, SAT-MOD-20090217-00024 (May 5, 2009) (“XM Radio Extension Grant”) (extending license term of XM-1 satellite by five years). Consistent with Section 25.161(b) of the Commission’s rules (47 C.F.R. § 25.161(b)), Globalstar can continue to operate its first-generation MSS satellites under its existing space station authority during the pendency of Globalstar’s modification request.*

<sup>11</sup> *Amendment of the Commission’s Rules to establish Rules and Policies Pertaining to a Mobile Satellite Service in the 1610-1626.5/2483.5-2500 MHz Frequency Bands, Report and Order, 9 FCC Rcd 5936, ¶ 185 (1994) (stating that “if fuel is left on the satellite after its license term has expired, we will entertain a request for special temporary authority to continue to operate if that location has not been assigned to a new system”).*

<sup>12</sup> *Orbcomm Order.*

both its on-orbit and yet-to-be-launched satellites.”<sup>13</sup> In recent years, the Commission has also extended the license terms of geostationary satellites through stamp grants.<sup>14</sup> Similarly, the Commission should grant Globalstar’s request for extension.

Globalstar’s continued operation of its first-generation NGSO satellites beyond the April 21, 2013 expiration date raises no interference risks or other technical issues. Globalstar is not proposing any change in the operation of its first-generation satellites, which will continue to conform to the technical parameters previously approved by the Commission.<sup>15</sup> The requested extension will also have no effect on Globalstar’s orbital debris mitigation plan for its first-generation Big LEO constellation. At their end-of-life, Globalstar’s first-generation satellites will have sufficient fuel to de-orbit to their planned disposal orbit altitude, and no alteration of Globalstar’s post-mission disposal plan is required.<sup>16</sup>

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<sup>13</sup> *Id.* ¶ 1.

<sup>14</sup> *See Intelsat Extension Grant; XM Radio Extension Grant.*

<sup>15</sup> The technical information that Globalstar has previously provided regarding its first-generation satellites remains unchanged and is incorporated by reference with this application. *See* Call Sign S2115, File No. SAT-MOD-20080904-00165, as amended by File No. SAT-AMD-20091221-00147; Call Sign S2115, File No. SAT-MOD-20030606-00098. *See also Globalstar Authorization Order.*

<sup>16</sup> In early 2005, the Commission approved Globalstar’s orbital debris mitigation plan for relocating satellites to graveyard orbit altitudes at end-of-life. *See* Globalstar Licensee LLC, Stamp Grant, SAT-MOD-20030606-00098 and SAT-AMD-20050105-00003 (Jan. 28, 2005). *See also* Globalstar 2012 Annual Report (describing interim or final graveyard orbit altitudes for Globalstar’s retired first-generation satellites).

### III. CONCLUSION

For the aforementioned reasons, the Commission should expeditiously grant Globalstar's request for modification of its authorization to extend the license term for its first-generation NGSO MSS constellation to October 4, 2024.

Respectfully submitted,

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*Counsel for Globalstar Licensee LLC*

March 14, 2013

**Exhibit A**  
**FCC Form 312, Response to Question 40**  
**Officers, Directors, and Ten Percent or Greater Shareholders**

The officers of Globalstar Licensee LLC are as follows:

Anthony J. Navarra, President  
Rebecca Clary, Treasurer  
Richard S. Roberts, Secretary  
L. Barbee Ponder IV, Assistant Secretary

Globalstar Licensee LLC is a Delaware limited liability company and is wholly owned by Globalstar, Inc. Globalstar, Inc., a U.S. corporation, is also the sole member of Globalstar Licensee LLC.

The address for Globalstar, Inc. and for all Globalstar Licensee LLC officers is:

300 Holiday Square Blvd.  
Covington, Louisiana 70433

The name, address, citizenship, and ownership interest of each individual or entity that directly or indirectly controls a ten percent or greater interest in Globalstar, Inc. is as follows:

Name: FL Investment Holdings LLC  
Address: 1735 19<sup>th</sup> Street, Suite 200  
Denver, Colorado 80202  
Citizenship: U.S.  
Voting Interest: 10.91%

Name: James Monroe III  
Address: 1735 19<sup>th</sup> Street, Suite 200  
Denver, Colorado 80202  
Citizenship: U.S.  
Voting Interest: 69.9%