



L. Barbee Ponder IV
General Counsel & Vice President Regulatory Affairs

July 3, 2017

Via Electronic Filing

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: Globalstar Licensee LLC and GUSA Licensee LLC Response to Comments:
IBFS File Nos. SAT-MOD-20170411-00061, SES-MOD-20170412-00422

Dear Ms. Dortch:

Globalstar Licensee LLC and GUSA Licensee LLC (together with its parent corporation Globalstar, Inc., “Globalstar”)¹ hereby respond to comments filed by the GPS Innovation Alliance (“GPSIA”) on the above-captioned applications for minor modification of Globalstar’s space station and blanket mobile earth terminal licenses to permit terrestrial wireless broadband operations in the 2483.5-2495 MHz band.² GPSIA was the only party to file comments on Globalstar’s applications by the International Bureau’s June 23, 2017 deadline.³

In its comments, GPSIA requests Globalstar’s acknowledgement that, in operating low-power terrestrial broadband systems at 2483.5-2495 MHz, Globalstar is required to comply with

¹ Globalstar Licensee LLC is the authorized licensee of the first-generation Globalstar satellite constellation (call sign S2115). GUSA Licensee LLC holds a blanket license for the operation of Globalstar mobile earth station terminals in the United States, and is responsible for the provision of Globalstar mobile satellite services to end users in the United States.

² See Applications for Modification, IBFS File Nos. SAT-MOD-20170411-00061, SES-MOD-20170412-00422; *Satellite Policy Branch Information, Applications Accepted for Filing*: Public Notice, 32 FCC Rcd 4131 (2017) (Report No. SPB-270; DA 17-509).

³ On June 23, 2017, Globalstar and the Wireless Communications Association International submitted a joint letter setting forth procedures for Globalstar’s network operating system in the event of a complaint of harmful interference from Broadband Radio Service or Educational Broadband Service licensees. See Letter to Marlene H. Dortch, Secretary, FCC, from Paul J. Sinderbrand, Counsel to the Wireless Communications Association International, and L. Barbee Ponder IV, General Counsel and Vice President Regulatory Affairs, Globalstar, Inc., IBFS File Nos. SAT-MOD-20170411-00061 and SES-MOD-20170412-00422 (June 23, 2017).

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the emissions levels into the 1559-1610 MHz band to which it previously agreed with the National Telecommunications and Information Administration.⁴ Globalstar understands that it remains subject to these 2008 commitments and confirms that its proposed low-power terrestrial wireless broadband operations at 2483.5-2495 MHz will comply with these out-of-band emissions limits into the 1559-1610 MHz band. Globalstar will meet these limits, and its terrestrial operations at 2.4 GHz will have no effect on GPS and Global Navigation Satellite System (“GNSS”) systems and devices operating in spectrum more than 800 megahertz away.⁵

Given the benefits for consumers and other substantial public interest benefits that will result from Globalstar’s terrestrial wireless broadband operations at 2483.5-2495 MHz, the International Bureau should expeditiously grant Globalstar’s applications for minor modification of its space station and blanket mobile earth terminal licenses.

Respectfully submitted,

/s/ L. Barbee Ponder IV

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President Regulatory Affairs

⁴ Comments of GPS Innovation Alliance, IBFS File Nos. SAT-MOD-20170411-00061, SES-MOD-20170422-00422, at 1-2 (June 23, 2017); *Globalstar Licensee LLC*, Order and Authorization, 23 FCC Rcd 15975, ¶¶ 35-36 (2008) (“Globalstar ATC Order”).

⁵ Globalstar would not oppose conditioning its authorization for low-power terrestrial service at 2483.5-2495 MHz on a requirement to comply with these out-of-band emissions limits. The Bureau’s Satellite Division can include this condition in language appended to a stamp grant of these applications.