



L. Barbee Ponder IV

General Counsel & Vice President Regulatory Affairs

March 11, 2019

Jose Albuquerque
Chief, Satellite Division
International Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Globalstar MSS Ancillary Terrestrial Component Authorizations – Globalstar Licensee LLC, Call Sign S2115, File No. SAT-MOD-20170411-00061; GUSA Licensee LLC, Call Sign E970381, File No. SES-MOD-20170412-00422

Dear Mr. Albuquerque,

In December 2018, Globalstar completed 3GPP standardization of Band 53. This new band class covers the terrestrially authorized spectrum from 2483.5 MHz to 2495 MHz.

Following standardization, equipment vendors have begun producing devices in support of Band 53 network deployments. As these devices are prepared to enter service, compliance laboratories have sought clarification on the proper method of measuring transmit power to meet the certification requirements in Part 25.149(c)(4)(iii). Specifically, compliance laboratories would like to confirm that:

- (a) The 1 W maximum transmit power may be measured via an averaging method;
- (b) The 6 dBW peak EIRP is computed by the application of the peak antenna gain to the 1 W maximum transmit power measured via an averaging method.

We respectfully request that you provide the above confirmations so that we can assist the compliance laboratories with final certification of Band 53 devices.

Naturally, if you have any questions or require additional information, please do not hesitate to contact me.

Sincerely,

/s/ L. Barbee Ponder IV

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