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Filed Electronically

August 17, 2009

Ms. Marlene Dortch, Secretary  
Federal Communications Commission  
445 – 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: Globalstar Licensee LLC - Call Sign S2115  
GUSA Licensee LLC - Call Sign E970381  
File No. SAT-STA-20081215-00231  
Request for Waiver and Request for Special Temporary Authority

Dear Ms. Dortch:

In the subject proceeding, Globalstar Licensee LLC and GUSA Licensee LLC (collectively “Globalstar”) sought a waiver of the Commission’s frequency assignments and/or special temporary (“STA”) to use channels in the portion of the Big LEO L-band between 1618.725 and 1621.35 MHz in eight Globalstar gateway earth stations outside the U.S.<sup>1</sup> The band 1618.725-1621.35 MHz encompasses channels 8 and 9 of the nine CDMA channels originally assigned to Globalstar in the Big LEO L-band.

In its Opposition to the Petition to Deny of Iridium Satellite, filed February 2, 2009, Globalstar stated that it no longer required a waiver or STA for the gateway in France and two gateways in Brazil operated by its subsidiaries. On April 30, 2009, Globalstar was able to reassign a lower channel to the gateway operated by the independent gateway operator (“IGO”) in Turkey, and on July 31, 2009, Globalstar was able to assign a lower channel to the IGO’s gateway in Meekatharra, Australia. Accordingly, at least for the near term, Globalstar only requires a waiver or STA for the three gateways in Russia where Globalstar’s IGO, Globaltel, is not authorized to use spectrum below 1616 MHz.

Respectfully submitted,

William F. Adler  
Vice President-Legal & Regulatory Affairs

CC: Robert Nelson  
Karl Kensinger

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<sup>1</sup> The portion of the band between 1618.725 and 1626.5 MHz is currently reserved for Iridium Satellite LLC pursuant to the Commission’s decision in Order of Modifications, FCC 08-248 (rel. Oct. 15, 2008) (“*Modification Order*”). Globalstar has petitioned for reconsideration of the Modification Order to the extent that it prohibits Globalstar from using the subject spectrum outside the U.S.