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March 22, 2010

To: Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C, 20554

Dear Ms. Dortch,

Closed Joint-Stock Company «Globalstar–Space Telecommunications» (CJSC GlobalTel) is the operator of the Russian segment of the Globalstar satellite system and provides mobile satellite communications services and data transmission in the territory of the Russian Federation and in neighbouring countries.

In accordance with the Service Provider Agreement CJSC GlobalTel is the only exclusive provider of the Globalstar services in this territory.

During the period from 1998 till now CJSC GlobalTel has performed a substantial complex of activities on legalizing the Globalstar system in Russia. The State Frequency Committee adopted decisions to allocate to CJSC GlobalTel frequency spectrums 5102,155 - 5248,885 MHz and 6900,855 - 7047,585 MHz for the Globalstar earth stations as well as frequency spectrums 2483,775 - 2494,845 MHz and frequencies 1616,88, 1618,11, 1619,34 and 1620,57 MHz in the 1610,115 - 1621,185 MHz spectrum for the Globalstar terrestrial user terminals. The coordination on the use of these frequencies with military authorities was conducted which is the requirement for obtaining radiofrequencies. The international coordination and registration of the frequency allocations to the Globalstar earth stations and user terminals in the Radio Bureau of the ICU were conducted. The required licenses of the RF Ministry of Telecommunications for the provision of the Globalstar mobile satellite services were obtained according to the established procedure.

Presently the regulator has issued to CJSC GlobalTel the new license valid through 2015, which implies the provision of the mobile satellite services in 1610,115 - 1621,185 MHz.

CJSC GlobalTel owns and operates three Globalstar earth stations (gateways) in Russia. The Russian Gateways located in the vicinity of Moscow, Novosibirsk and Khabarovsk were put into commercial operation in 2000 and are providing services to more than 40 thousand subscribers in their coverage areas.

As of today a stable demand for the mobile satellite services in the Russian Federation from potential users (legal and physical persons) is being observed.

CJSC GlobalTel is aware that in November 2007 the FCC issued a Second Order on Reconsideration and Second Report and Order in IB Docket No, 02-364 (FCC 07-194) that revised the U.S. Big LEO band plan to prohibit Code Division Multiple Access of CDMA operations in the spectrum between 1618.725 and 1621.35 MHz.

CJSC GlobalTel is also aware that in October 2008, the FCC issued an Order of Modifications (FCC 08-248) modifying Globalstar's space station license to correspond to the revised U.S. band plan, and in doing so decided that Globalstar would also be prohibited from operating on this spectrum in countries outside the United States, even though the spectrum is allocated in such countries for operations under the authority of the local regulators.

The above-mentioned Order of Modifications indicated that the FCC would entertain a request for waiver of its rules to allow Globalstar to continue to operate in certain countries on the spectrum above 1618,725 MHz if requiring Globalstar to cease operations in those countries on the affected spectrum would impose undue costs on Globalstar, its independent gateway operators, or their customers.

Hereby CJSC GlobalTel strongly urges the FCC to promptly grant Globalstar's Request for Waiver and Request for Temporary Authorities, which were submitted by the Licensee Globalstar LLC in December 2008.

In CJSC GlobalTel's opinion Globalstar has clearly demonstrated the need to continue its operation in this spectrum in a number of countries outside the USA, including Russia. We urge the FCC to grant the Globalstar Request for Waiver.

In the event the FCC does not satisfy Globalstar's Request for Waiver it will actually deny CJSC GlobalTel the possibility to continue its services to subscribers and to develop its business because the Russian legislation prohibits to provide telecommunications services without respective licenses, certificates and other permissive documents and the introduction of any changes to the frequency spectrum will require to obtain new permissive documents.

Pursuant to the decision of the State Frequency Committee of the Russian Federation CJSC on the issue of the frequency spectrum for Globalstar operation GlobalTel has a strong obligation to observe the electromagnetic compatibility with radio-facilities of the RF radioastronomic observatories and with the GLONASS user navigation equipment. The need for the frequency coordination with these bodies creates limitations on GlobalTel's use of the spectrum which would be severely exacerbated by a reduction in that available spectrum.

CJSC GlobalTel will be required to coordinate the reduced spectrum anew with military authorities, with the radioastronomy service, a second round of international legal protection for the frequency allocations for the Globalstar earth and user stations will become necessary. CJSC GlobalTel will also be forced to draw up some permissive documents which will require significant financial investments, will lead to the interruption in the provision of services and as a result to significant losses.

If the FCC does not authorize Globalstar's continued operations in the spectrum between 1618.725 and 1621.35, the constraints of Globalstar's system architecture and the likely regulatory constraints imposed in other countries will lead to similar spectrum shortages in a number of other countries and regions in which Globalstar provides service. As Globalstar is a global system and international roaming access is provided between the local Globalstar operations of various countries, this decision would indirectly adversely affect CJSC GlobalTel and its customers by adversely affecting outbound international roaming services.

Allowing Globalstar to continue to operate in Russia on the spectrum above 1618,725 MHz will not cause interference with the Iridium system, because the Russian regulator has not issued operator's licenses for TDMA MSS operations below 1621.35 MHz.

In order to continue the provision of Globalstar services in Russia and to provide for growth of its business, CJSC GlobalTel must make very significant capital investments in upgrading its earth stations to support Globalstar's second-generation systems and in acquiring new equipment to expand the provided services.

Considering the above as well as the fact that CJSC GlobalTel's primary concern is to protect its business in Russia at present and in future CJSC GlobalTel accordingly strongly urges the FCC to promptly grant Globalstar's Request for Waiver to permit it to continue to provide service to the areas covered by the Russian earth stations using the spectrum between LGL8.725 and 1621.35.

Failure by the FCC to grant Globalstar's Request for Waiver would unfairly and unjustifiably harm CJSC GlobalTel, its employees, and its customers in the region and will force GlobalTel to consider the possibility to protect its interests in international and US courts.

Should you wish to discuss this matter further, we can be contacted on phone/fax +7-495-984-26-66/+7-495-984-26-27 or by e-mail Oleg.Shedenkov@globaltel.ru.

Sincerely,

Oleg Shedenkov
General Director
CJSC GlobalTel

A handwritten signature in black ink, appearing to read 'Oleg Shedenkov', written in a cursive style.