



300 Holiday Square Blvd.
Covington, LA 70433
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August 10, 2010

Roderick K. Porter
Deputy Chief, International Bureau
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: Globalstar Licensee LLC – Call Sign S2115
GUSA Licensee LLC – Call Sign E970381
File No. SAT-STA-20081215-00231

Dear Mr. Porter:

By letter dated July 19, 2010 filed in the referenced proceeding, Globalstar Licensee LLC and GUSA Licensee LLC (collectively, "Globalstar") notified the Commission that it had identified a solution that would allow it to cease using the spectrum in Russia between 1618.725 and 1621.35 MHz (Channels 8 and 9) in accordance with the Commission's prior Order,¹ yet continue to provide service through the three Globalstar gateway earth stations located in Russia. Further, Globalstar committed to implement the solution by no later than September 15, 2010.

By this letter, Globalstar informs the Commission that as of yesterday, August 9, 2010, Globalstar has implemented all modifications necessary to cease using Channels 8 and 9 in Russia. Thus, Globalstar is now in full compliance with the Commission's *Modification Order*, i.e. Globalstar is not utilizing the frequencies between 1618.725-1621.35 MHz anywhere within its global satellite network. As Globalstar previously stated, it will file, with the support of Globaltel, a formal application to the State Frequency Committee of the Russian Federation for authority to operate in the spectrum below 1616 MHz. The grant of such additional authority by the Committee is necessary to mitigate the harmful consequences of vacating the affected spectrum and accommodate Globalstar's expanding customer base within that region.

Further, Globalstar requests that its pending request for an STA be modified to permit it to continue to operate between 1618.725-1621.35 MHz at its gateways through August 9, 2010, the date the modifications were completed to vacate the spectrum.²

¹ See Order of Modifications, FCC 08-248 (rel. Oct. 15, 2008) ("*Modification Order*").

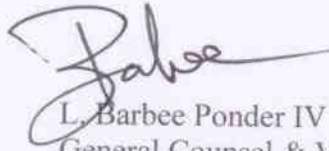
² See Globalstar Licensee LLC and GUSA Licensee LLC - Request for Waiver and Request for Special Temporary Authority, File No. SAT-STA-20081215-00231 (filed Dec. 15, 2008)

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Finally, on November 14, 2008, Globalstar filed a petition for reconsideration of the *Modification Order* to the extent that it prohibits Globalstar from using the subject spectrum outside the U.S.³ To date, Globalstar's petition has remained pending. Globalstar requests that this petition for reconsideration be withdrawn without prejudice to its rights to petition the Commission for further relief in the future should circumstances so warrant.

Naturally, should you have any questions concerning this submission, please do not hesitate to contact me.

Sincerely,



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

CC: Paul de Sa
Mindel De La Torre
Robert Nelson

³ See Petition for Reconsideration of Globalstar Licensee LLC and GUSA Licensee LLC (filed Nov. 14, 2008).