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December 14, 2009

FILED ELECTRONICALLY VIA IBFS

Mr. Robert G. Nelson
Chief, Satellite Division
International Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: Globalstar Licensee LLC Request for Interim Operating Authority
File No. SAT-STA-20090527-00058

Dear Mr. Nelson:

On behalf of Globalstar Licensee LLC (“Globalstar”), this letter responds to the questions raised in your November 30, 2009, letter in reference to above-referenced application¹ in which Globalstar has sought temporary interim operating authority to transition from its authorized 40-operating-satellite constellation to a 48-satellite constellation in connection with the placement into service of eight spare replacement satellites that were launched in 2007, and to make continual adjustments to the in-plane positions of its older satellites with fully or partially functioning S-band subsystems.

Question: “With respect to the requested arrangement of satellites, please clarify whether, in the Table at page 3 of the attachment to the application, the figures given in the ‘Interim Operation Requested’ column for number of planes and plane spacing at equator are meant to apply to the 16-satellite Walker and 32-satellite Walker constellations individually, or together. Stated differently, will be 16-satellite Walker constellation consist of 8 planes, and the 32-satellite Walker constellation consist of 8 planes?”

¹ See Globalstar Licensee LLC Request for Interim Operating Authority – Call Sign S2115 – FCC File No. SAT-STA-20090527-00058 (filed May 27, 2009). Since receipt of your letter, Globalstar has sought a further extension of the requested STA. See Globalstar Licensee LLC Request for Interim Operating Authority – Call Sign S2115 – FCC File No. SAT-STA-20091130-00131 (filed Nov. 30, 2009). Globalstar is submitting a copy of this letter in the IBFS record for that request as well.

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Response: The Globalstar satellites will continue to operate in 8 planes only. The 32 Walker and the 16 Walker constellations will share the same eight planes, which are separated by 45 degrees.

Question: “To the extent that the requested constellation structure as a whole involves 16 planes, please indicate whether the relationship between the planes of the two sub-constellations will exhibit a fixed structure, or whether it will vary as circumstances require, and any factors that may affect such variation.”

Response: As explained above, the Globalstar satellites will continue to operate in 8 planes only. As such, there will be no 16 plane constellation.

Question: “To the extent that the requested structure involves only eight planes in total for the two sub-constellations, please clarify and expand upon the information provided with respect to relative phasing.”

Response: The 32 Walker constellation will be a 32/8/3 Walker, which means that the satellites within a plane will be phased by 90 degrees from one another, and from one plane to an adjacent plane satellites will be phased by 33.75 degrees from one another. The 16 Walker constellation will be a 16/8/5 Walker, which means that the satellites within a plane will be phased by 180 degrees from one another, and from one plane to an adjacent plane satellites will be phased by 112.5 degrees from one another.

Question: “What service(s) will be provided via the proposed 32-satellite sub-constellation, and what service(s) will be provided via the proposed 16-satellite sub-constellation?”

Response: The 32 Walker constellation will provide both Duplex and Simplex services. The 16 Walker constellation will provide primarily Simplex services, although some of the satellites – specifically those that continue to have functional S-band amplifiers – will provide Duplex services as well.

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Should you have any further questions concerning this matter, please let me know.

Sincerely yours,

/s/ Samir C. Jain

Samir C. Jain
Counsel to Globalstar Licensee LLC

cc: Mr. Karl Kensinger (by email)