



International Bureau

Federal Communications Commission
Washington, DC 20554

November 30, 2009

William F. Adler
Secretary, Globalstar Licensee LLC
Vice President-Legal & Regulatory Affairs
Globalstar, Inc.
461 South Milpitas Boulevard
Milpitas, California 95035

Josh Roland
WilmerHale
1875 Pennsylvania Avenue, NW
Washington, DC 20006

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

Dear Sirs:

This letter requests additional information in connection with the above-referenced application for authority to operate at variance from the terms and conditions of Globalstar's Big LEO satellite license, specifically with respect to the arrangement of satellites within the constellation. The application seeks to change the satellite arrangement from a 40-satellite Walker constellation with three in-orbit spares to a "flexible" 48-satellite configuration consisting of a 16-satellite Walker constellation and a 32-satellite Walker constellation with two in-orbit spares. Additional information is needed to facilitate consideration of this request.

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 the 16-satellite Walker constellation consist of 8 planes, and the 32 satellite Walker constellation consist of 8 planes? 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. 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.

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?

The referenced application may be subject to dismissal pursuant to Section 25.112(c) of the Commission's rules if a response to this inquiry is not filed by December 14, 2009.

Sincerely,

A handwritten signature in black ink, appearing to read 'R. Nelson', followed by a long horizontal line extending to the right.

Robert G. Nelson
Chief, Satellite Division
International Bureau