



March 11, 2011

VIA ELECTRONIC FILING

Hon. Julius Genachowski
Chairman
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: Iridium Satellite LLC
Request for Special Temporary Authorization to Test and Commence
Mobile Satellite Service in the 1616-1617.775 MHz Band

Dear Chairman Genachowski:

I am writing in response to the Request for Special Temporary Authorization filed by Iridium Satellite LLC ("Iridium") to utilize a portion of spectrum dedicated to the operations of Globalstar, Inc. ("Globalstar") in the 1616–1617.775 MHz band. For the following reasons, Globalstar must object to Iridium's request.

Globalstar is presently providing emergency communications services via its SPOT Satellite GPS Messengers ("SPOTs") in and around the islands of Japan. These low-cost mobile SPOT devices provide, among other things, emergency SOS messaging services to subscribers. Within the geographic area encompassing Japan, Globalstar utilizes the frequencies between 1615–1617.775 to provide these messaging services. Granting Iridium's request – which would result in interference in over 60% of this band - would cause degradation in Globalstar's network capability to complete messaging within this region, including potentially life-saving emergency messaging.

An initial review of our systems reveals that in the past 30 days, there were 58 unique SPOT units that transmitted 3922 messages, including twelve (12) SOS messages in and around Japan. In the past 24 hours, Globalstar has experienced an increase of over 30% in the number of SPOT messages received when compared to the previous six days, a trend we expect to increase markedly over the next few days.

In addition to the SPOT units already present in the area, we expect certain international relief workers traveling to the area to rely upon their SPOT devices as well. Also, Globalstar is presently reaching out to such relief groups and offering SPOT units for their free use.

The events in Japan are clearly a horrible tragedy, and Globalstar obviously recognizes the need to facilitate emergency communications in that area to the greatest extent possible. Unfortunately, however, granting Iridium's request would have the effect of interfering with such emergency communications by Globalstar users, and accordingly Globalstar cannot accede to Iridium's request to use part of Globalstar's spectrum band.



Naturally, if you have any questions or need additional information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "L. Barbee Ponder IV". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

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

cc: Roderick Porter
Bob Nelson
Karl Kensinger
Cassandra Thomas
Kathryn Medley