L. Barbee Ponder
General Counsel & Vice President Regulatory Affairs

March 23, 2011

Roderick Porter
Deputy Chief, International Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Jennifer Hindin
Wiley Rein LLP
1776 K Street, NW
Washington, D.C.

Re: Iridium Satellite LLC
File # SAT-STA-20110311-00052

Dear Mr. Porter and Ms. Hindin:

I am writing to detail the interference issues with which Globalstar and its customers are presently experiencing ***globally*** as a result of the referenced special temporary authority ("STA") granted to Iridium.

During the past week, Globalstar has been conducting the final testing of the last two satellites from the October launch prior to their entry into service. During these operations, Globalstar experienced interference while using its IOTE at both the Clifton, Texas and Aussaguel, France gateways. Upon further investigation, Globalstar has determined that this interference is being caused by Iridium's use of the specific frequencies covered by the special temporary authority first granted on March 11, 2011.

Globalstar understood that the authority granted to Iridium was limited to the use of the specific frequencies (1616-1617.775) in and around Japan "in support of relief efforts following the earthquake ...." In practice, however, Iridium is utilizing these specific frequencies on a world-wide basis.

Thus, Globalstar's entire network, as well as all of its more than 432,000 subscribers, are presently contending with interference from Iridium's use of the 1616-1617.775 MHz frequencies in violation of the terms and conditions under which the Commission granted the special temporary authority. This interference is affecting the quality of service received by Globalstar's customers utilizing both its duplex and simplex products, including over 200,000 customers that utilize the SPOT device for emergency messaging services world-wide.

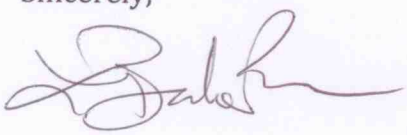
Office: 985-335-1503 * Fax: 985-335-1703
300 Holiday Square Boulevard, Covington, LA 70433
globalstar.com

I have attached a brief presentation containing the specific technical data confirming Iridium's interference at both the Clifton, Texas and Aussaguel, France gateways.

We request that Iridium suspend operations in the 1616-1617.775 MHz band as provided in paragraph 4 of the Conditions to Grant of the authority. Further, if Iridium is unable to ensure on a going forward basis that its resumed use of the frequencies will be geographically limited to the area in and around Japan, Globalstar requests that the International Bureau terminate this STA. Globalstar reserves its rights to provide additional information in support of these requests as it becomes available.

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

Sincerely,



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

cc: Gardner Foster
Robert Nelson
Karl Kensinger
Cassandra Thomas
Kathyrn Medley

Office: 985-335-1503 * Fax: 985-335-1703
300 Holiday Square Boulevard, Covington, LA 70433
globalstar.com

Globalstar

Iridium Interference in Channels 5 & 6 in US, Europe and worldwide – STA in Japan

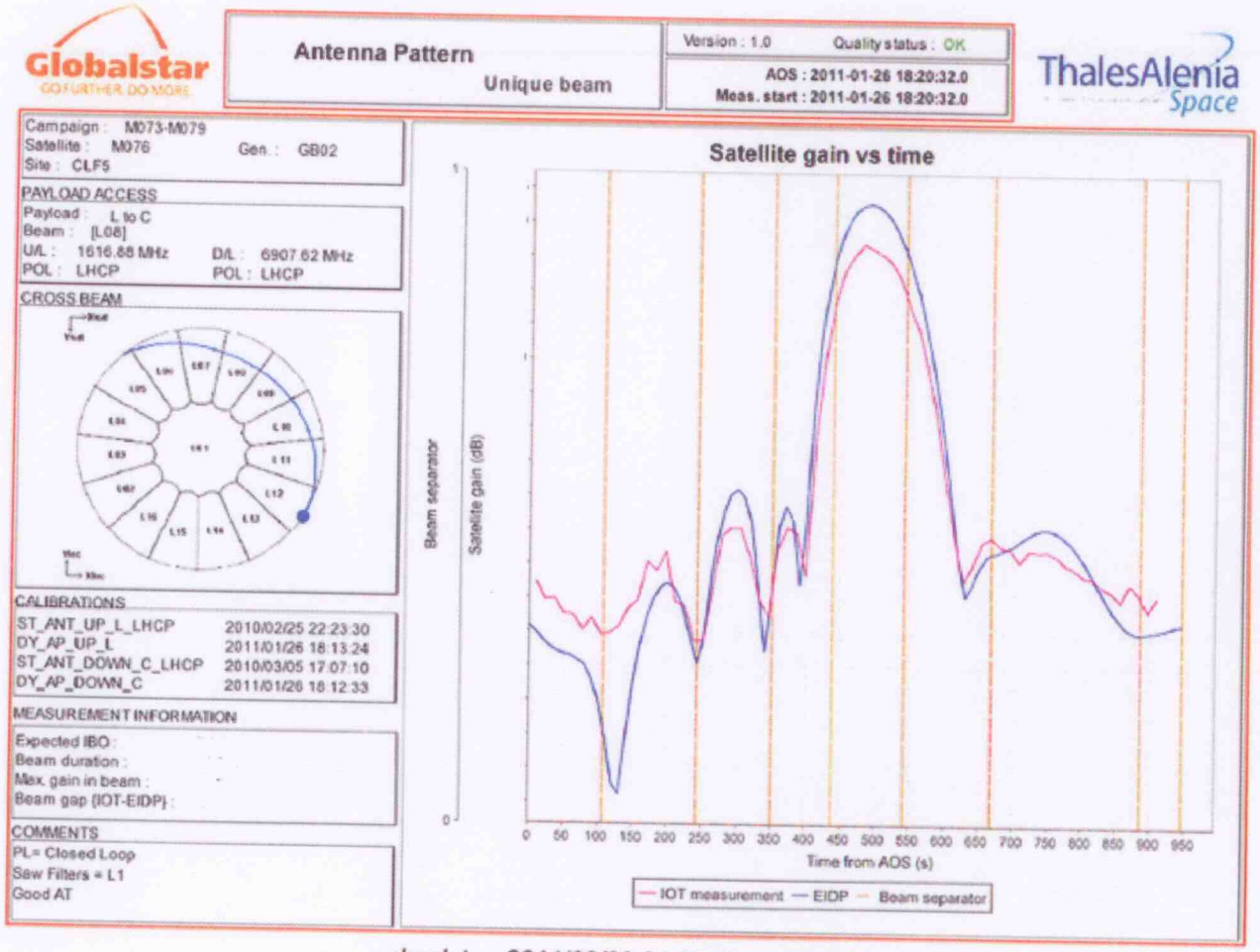
Systems Engineering

23rd March 2011

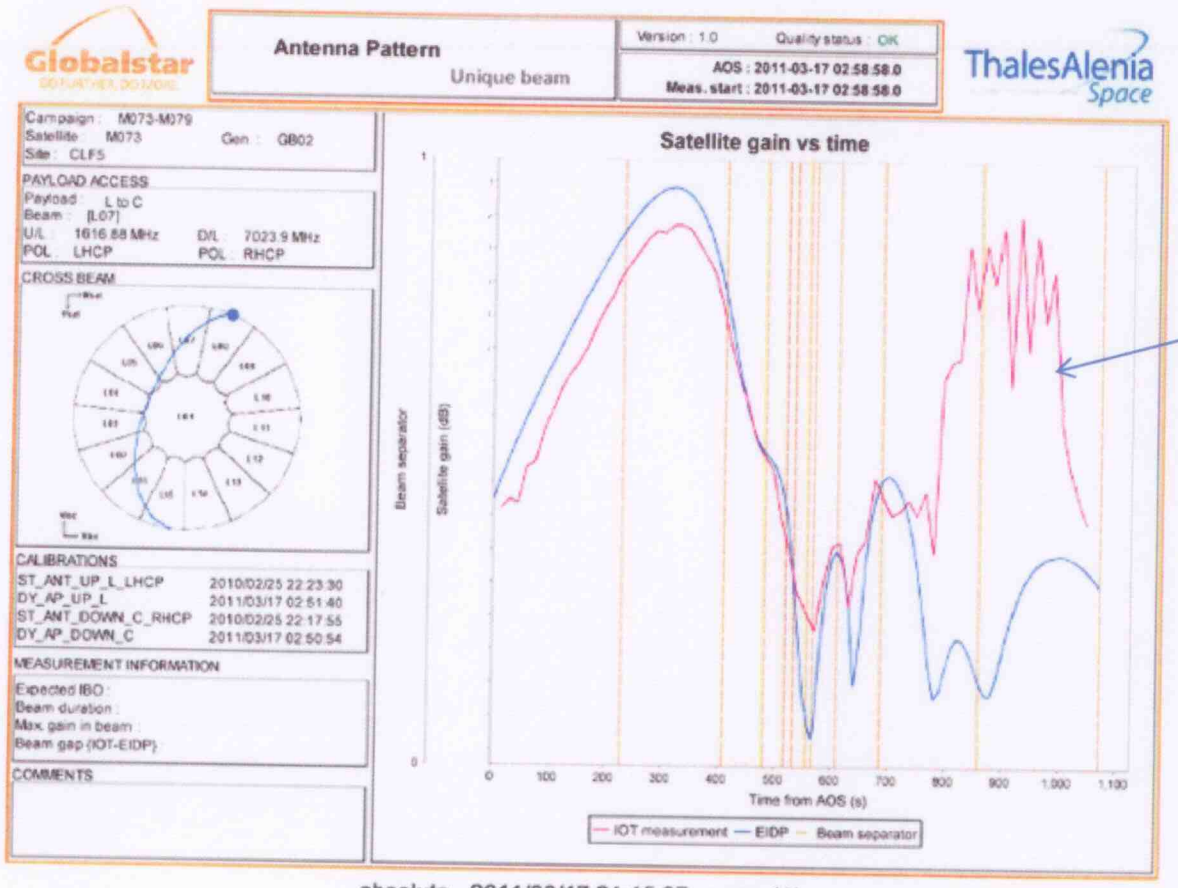
Introduction

- Iridium was granted STA for operation in Japan.
- STA grants use in 1.775 MHz from 1616 - 1617.775.
- This frequency range overlaps with Globalstar channels 5 & 6.
- Globalstar has observed interference from Iridium's use of Channel 5 & 6 in Clifton and Aussaguel during the IOT measurements of Globalstar Gen 2 satellites.
  - During the 13 IOT measurements conducted in last 1 1/2 week, 17 beams out of measured 57 beams experienced interference. Each measurement characterizes the behavior of 4-5 beams in view of the IOT test antenna. There are total of 96 beams for 6 launched satellites.
  - This interference is seen by all the satellites (Gen 1 and Gen 2) and all the beams in view of the service area.
- To confirm the source of interference, Globalstar conducted several spectrum analyzer measurements at Clifton.
- The spectrum signature of the interference carriers matched Iridium as the narrow band carriers are greater than 5 to 7 dB higher compared to Globalstar's broadband carriers.
  - Signal levels are up to 13-15 dB higher than normal Globalstar traffic.
- IOT measurements were also compared to those taken before the STA grant during the period of Nov 2010 to March 2011.

IOT measurements @ Clifton on 26th Jan (prior to STA)

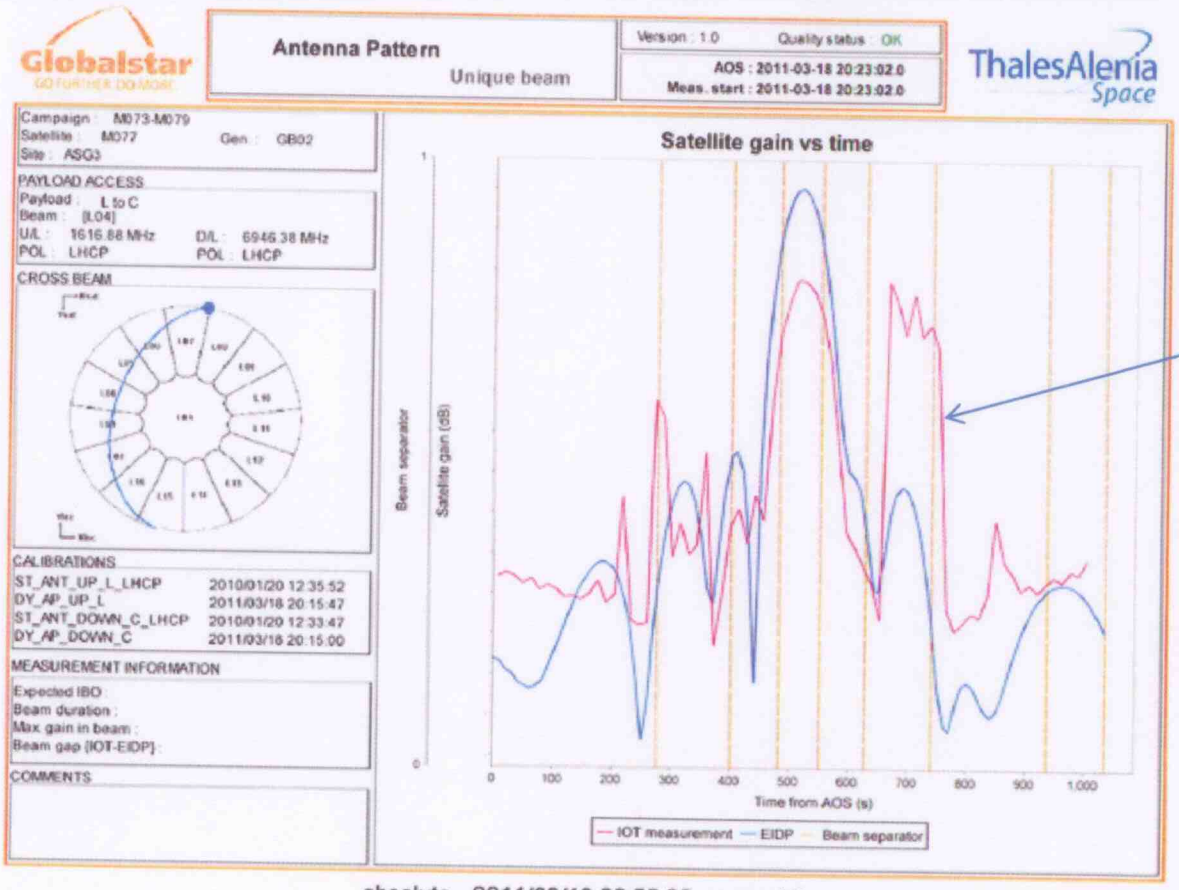


Interference for IOT @ Clifton – 17th Mar 2011 - USA

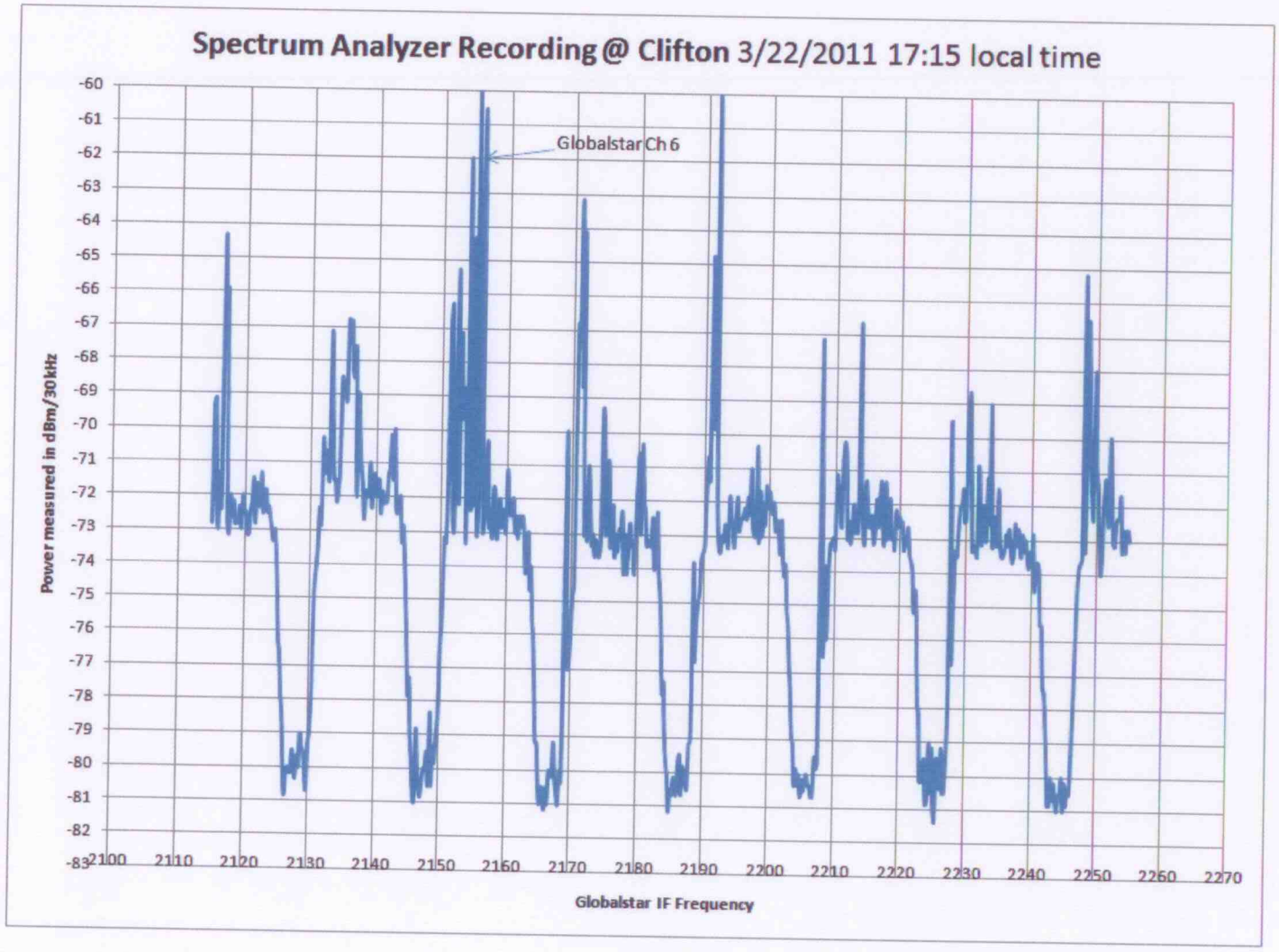


Interference

Interference for IOT @ Aussaguel – 18th Mar 2011 - Europe

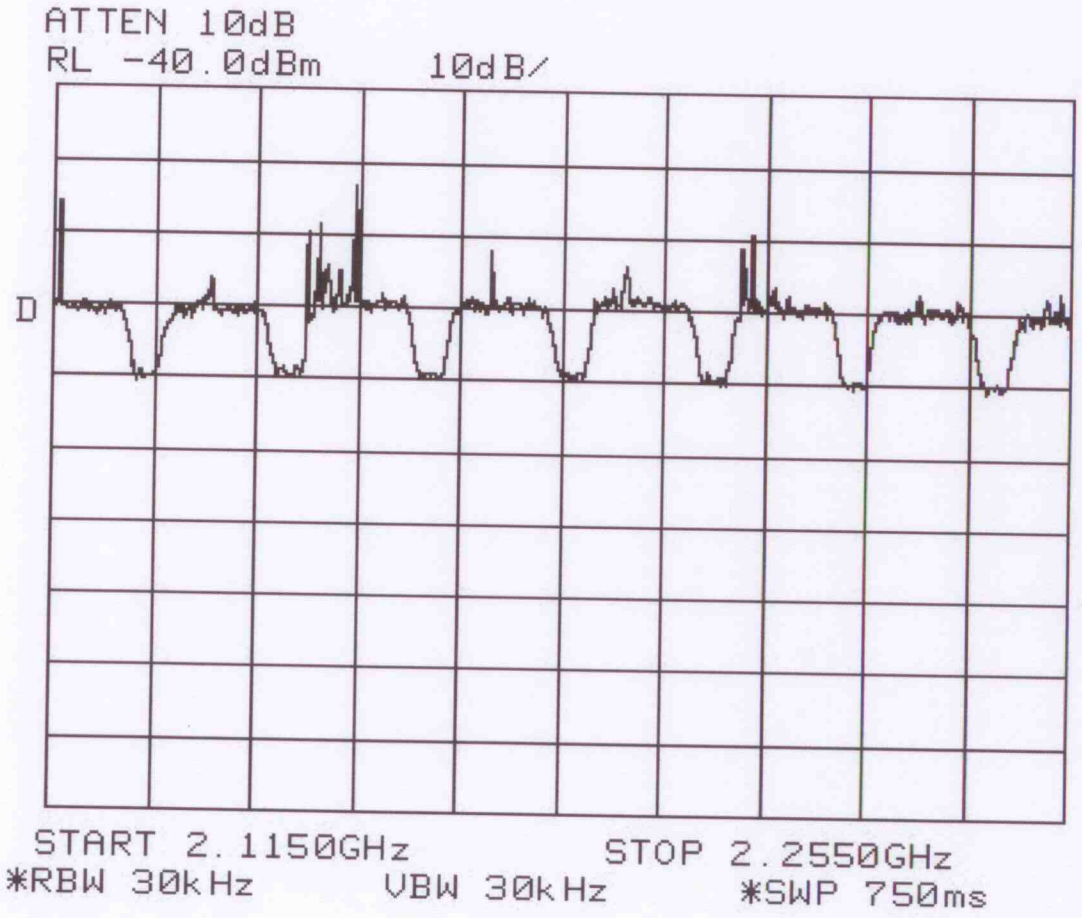


Spectrum Analyzer Measurements @ Clifton

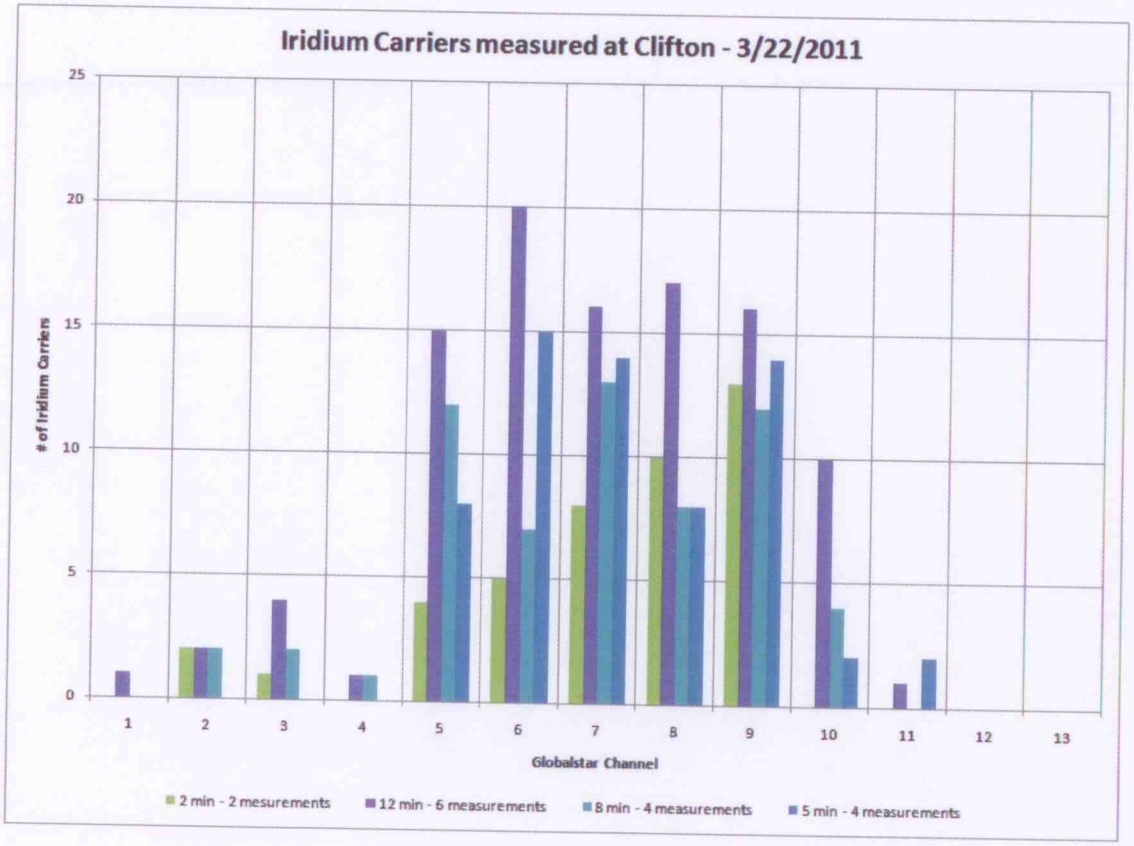


Spectral inversion @ IF

Spectrum Analyzer snapshot @ Clifton



Iridium Carriers Measured at Clifton



- Each measurement indicates a 30 second recording with a resolution bandwidth of 30 kHz.
- No of carriers seen 5 to 7 dB stronger than Globalstar signal were counted during each consecutive measurement.
- Globalstar channels 5 and 6 was equally loaded with Iridium carriers compared to Iridium channels 8 and 9
- 5 to 20 carriers were seen in channel 5 and 6 in USA, even though STA was granted in Japan.