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June 12, 2009

Ms. Marlene Dortch, Secretary
Federal Communications Commission
445 – 12th Street, SW
Washington, DC 20554

Re: Iridium Satellite LLC
Call Sign E960132
File No. SES-AMD-20090518-00598

Dear Ms. Dortch:

Globalstar, Inc., Globalstar Licensee LLC and GUSA Licensee LLC (collectively “Globalstar”) hereby submit this comment pursuant to Section 25.154(b), 47 C.F.R. § 25.154(b), of the Commission’s Rules.

The referenced application, filed May 13, 2009, amends a minor modification to Iridium’s OpenPort services¹ wherein Iridium requests authority to change its licensed facilities to add a new antenna (“OpenPort”) and emission designators.

Globalstar generally has no objection to Iridium’s operating OpenPort terminals in the band above 1618.725 MHz, specifically the carrier types defined by the additional emission designators requested in the referenced application, provided that the carrier frequencies are centered to create enough guardband between the lower edge of the carrier’s occupied band and the edge of the shared band with Globalstar at 1618.725 MHz. The carrier out-of-band emissions below 1618.725 MHz must remain below -49 dBm/Hz with progressively lower limits for offsets greater than 160 kHz from the carrier edge. See ETSI Standard EN 301 441, “Satellite Earth Stations and Systems (SES); Harmonized EN for Mobile Earth Stations (MESs), including handheld earth stations, for Satellite Personal Communications Networks (S-PCN) in the 1,6/2,4 GHz bands under the Mobile Satellite Service (MSS) covering essential requirements under Article 3.2 of the R&TTE directive” (May 2005). Based on the OpenPort spectral masks submitted as an Exhibit to the Modification, Globalstar calculates that the lowest 41.67 MHz-wide Iridium channel used for OpenPort devices can be centered no lower than 1618.83 MHz in order to maintain 83.33 kHz of guardband in compliance with the ETSI standard.

¹ See Iridium Satellite LLC, Call Sign E960132, File No. SES.MOD-20081223-01705, and Iridium Carrier Services LLC, Call Sign E960622, File No. SES-MOD-20081223-01704.

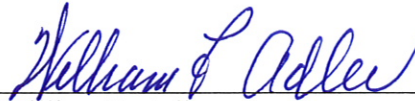
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Globalstar requests confirmation from Iridium that it intends to meet these requirements globally.

Respectfully submitted,

GLOBALSTAR, INC.
GLOBALSTAR LICENSEE LLC
GUSA LICENSEE LLC

By:



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