

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Iridium Satellite LLC and Iridium Carrier Services LLC Applications to Modify Mobile Satellite Blanket Licenses for Mobile Earth Stations)	File Nos. SES-MOD-20170413-00388, SES-MOD-20170413-00389, SES-AMD-20170726-00812, and SES-AMD-20170726-00813

COMMENTS OF GLOBALSTAR, INC.

Globalstar, Inc. (“Globalstar”) hereby comments on the above-captioned applications of Iridium Satellite LLC and Iridium Carrier Services LLC (together, “Iridium”) to modify their existing blanket mobile terminal licenses to add authority for next-generation maritime mobile earth stations, land mobile earth stations, aeronautical mobile earth stations, and Aeronautical Mobile Satellite (Route) Service (“AMS(R)S”) earth stations.¹ Iridium’s next generation of earth stations consists of a single “one size fits all” terminal, known as “Iridium Certus,” that would operate in a variety of communications environments. With respect to aeronautical applications, Iridium indicates that it is pursuing civil aviation approvals from the Federal Aviation Administration and RTCA for the use of Iridium Certus terminals to provide AMS(R)S, and that these terminals will be installed in commercial air transport, air cargo, and business jets that operate in the United States and international airspace.

In processing the Iridium Certus Applications, the International Bureau should account for the regulatory status of Iridium’s mobile satellite service (“MSS”) operations in the Big LEO

¹ Applications of Iridium Satellite LLC, IBFS File Nos. SES-AMD-20170726-00812 (filed July 26, 2017), SES-MOD-20170413-00388 (filed April 13, 2017); Applications of Iridium Carrier Services LLC, IBFS File Nos. SES-AMD-20170726-00813 (filed July 26, 2017), SES-MOD-20170413-00389 (filed April 13, 2017) (collectively, “Iridium Certus Applications”); *see also* Public Notice, *Satellite Communications Services re: Satellite Radio Applications Accepted for Filing*, Report No. SES-01980, at 1-10, 16-25 (rel. Aug. 9, 2017).

MSS band at 1617.775-1626.5 MHz. While Iridium operates on a bi-directional basis in this frequency band – including the 1617.775-1618.725 MHz band segment that it shares with Globalstar² – there is only a secondary allocation for MSS space-to-earth operations (“downlinks”) at 1613.8-1626.5 MHz.³ Iridium’s MSS downlink transmissions thus have secondary status and must avoid interference to and accept interference from other licensed services. In addition, under existing Big LEO rules, Iridium and Globalstar are required to coordinate their use of the shared portion of the band and are subject to inter-service coordination requirements designed to protect radioastronomy and radionavigation.

As Globalstar has previously pointed out, Iridium’s AMS(R)S operations in the Big LEO band appear inconsistent with the secondary regulatory status of its downlink transmissions, since AMS(R)S as a safety service generally requires priority over other co-frequency uses.⁴ If AMS(R)S operations using Iridium’s Certus terminals were given priority access in the Big LEO band without limits or regard for the existing coordination regime in the band, this outcome would inappropriately elevate the status of Iridium’s AMS(R)S operations over all other MSS public safety services. This result could frustrate Globalstar’s efforts to meet the vital needs of first responders and other public safety customers during times of emergency when they too require immediate access to an available channel. Certainly, it would be unfair if Globalstar and its customers were compelled to limit its operations to protect Iridium’s AMS(R)S from interference. This is particularly true since Iridium did not apply for AMS(R)S authority until

² Iridium is authorized to share spectrum with Globalstar at 1617.775-1618.725 MHz.

³ See *Iridium Constellation LLC, for Authority to Modify License for a Low Earth Orbit Mobile Satellite System*, Memorandum Opinion and Order, 28 FCC Rcd 964, ¶ 2 (IB 2013) (DA 13-141) (“*Iridium AMS(R)S Order*”).

⁴ Comments of Globalstar, Inc., File Nos. SAT-MOD-19961204-00139, SAT-AMD-20050816-00160, and SAT-AMD-20051118-00236 (Jan. 11, 2012).

long after the cut-off date for mutually-exclusive applications for MSS operations at 1610-1626.5 MHz.⁵ Such operational restrictions would impair service to Globalstar's first responder customers and undercut Globalstar's greater than \$5 billion investment in its global MSS network, including more than \$1 billion in its second-generation MSS constellation.

As it did in 2013 when it granted Iridium AMS(R)S authority, the International Bureau should avoid these harms by imposing a condition on any grant that makes clear that such action will not restrict existing MSS licensees in adjacent frequency bands.⁶ Specifically, the Bureau should stipulate that Iridium can seek additional interference protection for its Certus terminals only through new or modified inter-operator agreements with Globalstar or other MSS systems.⁷ Under this condition, if Iridium claims or seeks additional interference protection from the Commission instead of through an inter-operator arrangement, the Bureau will consider this request premature and inconsistent with the requirements of its blanket mobile earth station license.

Respectfully submitted,

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⁵ See, e.g., *Iridium AMS(R)S Order* ¶ 5.

⁶ See *id.* ¶ 11.

⁷ See *id.* ¶ 16.

Certificate of Service

I hereby certify that on this 8th day of September, 2017, I caused a true and correct copy of the foregoing Comments of Globalstar, Inc. to be mailed by U.S. mail to:

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/s/ Ruth E. Holder
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