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October 30, 2020

Via Electronic Filing

Tom Sullivan
Chief, International Bureau
Federal Communications Commission
45 L Street NE
Washington, DC 20554

Re: **Minor Amendment – Application for Modification of Earth Station
Authorization (FCC File No. SES-MOD-20200728-00812); GCL Licensee LLC
– Call Sign E990337, Las Palmas, PR**

Dear Mr. Sullivan:

GCL Licensee LLC (together with its parent Globalstar, Inc., “Globalstar”), pursuant to Section 25.116 of the Commission’s rules,¹ hereby amends its pending application for modification of its feeder link earth station antenna operating in Las Palmas, Puerto Rico, under call sign E990337.² Under this pending modification request, Globalstar would operate one of its second-generation earth station antennas in Las Palmas under call sign E990337. With this minor amendment, Globalstar now requests authority to modify this Las Palmas earth station antenna so that, in addition, it can transmit a new waveform over Globalstar’s mobile satellite service (“MSS”) network. Globalstar hopes to use this waveform to improve and enhance its safety-of-life MSS offerings.

Globalstar submitted its application for modification of this gateway antenna in Las Palmas on July 28, 2020. As described in that filing, grant of permanent authority for this

¹ 47 C.F.R. § 25.116.

² See Application of GCL Licensee LLC, FCC File No. SES-MOD-20200728-00812 (July 28, 2020) (“July Modification Application”); *Satellite Communications Services re: Satellite Radio Applications Accepted for Filing*, Public Notice, Report No. SES-02312 at 13 (Oct. 21, 2020). Globalstar is currently operating this Las Palmas gateway earth station antenna as was proposed in its pending modification application, pursuant to a Commission grant of Special Temporary Authority. See FCC File No. SES-STA-20200804-00824; *Satellite Communications Services Information re: Actions Taken*, Public Notice, Report No. SES-02314 at 22 (Oct. 28, 2020) (“October STA Grant”).

second-generation antenna will provide significant operational benefits for Globalstar's MSS network. Globalstar's second-generation earth station antennas are 6-meter dishes with radomes, manufactured by SeaTel. These antennas will be more efficient than Globalstar's existing transceivers, requiring less power and only minimal maintenance. These second-generation facilities will also provide superior satellite-tracking capability, relying on state-of-the-art auto-track technology. These antennas will be similar to Globalstar's current gateway systems from an RF perspective, and will comply with all applicable Commission regulations.³ Given the benefits of these second-generation earth station antennas, Globalstar plans to deploy and operate these antennas at its Las Palmas facility and its other U.S. gateway locations over the next one to two years.

Globalstar's proposed second-generation gateway antenna in Las Palmas will support all the carriers that are currently supported by Globalstar's existing Las Palmas gateway facilities. In addition, as indicated above, Globalstar with the instant minor amendment now seeks permanent authority to use the proposed earth station antenna to transmit a new waveform over its MSS network. Globalstar is currently transmitting this waveform from this gateway antenna (call sign E990337) on a temporary basis.⁴ Use of this waveform will enhance Globalstar's safety-of-life MSS offerings.

Globalstar provides the relevant technical parameters for its transmission of this waveform in its response to Schedule B, Question E50 of FCC Form 312.⁵ This new waveform is a burst mode packet data carrier that will support short-messaging data services. The channel bandwidth for this waveform is 4.5 megahertz at 5096-5250 MHz (emission designator 4M50G7D) and 200 kilohertz at 6900-7055 MHz (emission designator 200KG7D). Notably, the instant minor amendment does not affect total EIRP for Globalstar's proposed modified earth station antenna, and transmission of the new waveform creates no greater potential for interference than Globalstar's existing operations at 5091-5250 MHz/6875-7055 MHz.⁶

³ The July Modification Application also proposed to add a new emission designator to Globalstar's authorization under call sign E990337, for receive-only simplex/SPOT services (emission designator 2M50G7D) (*see* Schedule B, Question E50 of FCC Form 312).

⁴ *See October STA Grant; note 2 supra.*

⁵ With the instant minor amendment, Globalstar also includes international frequency coordination information for the proposed, modified antenna that is requested by FCC Form 312, Schedule B. *See* Response to FCC Form 312, Schedule B, Question E19: International Frequency Coordination. Due to an inadvertent error, Globalstar did not provide this information in the July Modification Application. Globalstar's proposed transmission of the new waveform has no effect on this international coordination information.

⁶ As indicated in Schedule B to both the July Modification Application and the instant amendment, permanent authorization of Globalstar's second-generation earth station antenna in Las Palmas will permit a slight increase in total EIRP for operations under call sign E990337. Specifically, total EIRP under this license will increase from 68.0 dBW to 68.4 dBW. *See* Response to FCC Form 312, Schedule B, Question E28.

Mr. Tom Sullivan
October 30, 2020
Page 3

Expeditious grant of the instant amended modification application will produce substantial benefits for Globalstar's MSS network and further the public interest. Please do not hesitate to contact me with any questions.

Respectfully submitted,

/s/ Stephen J. Berman
Stephen J. Berman

cc: Paul Blais