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Via Electronic Filing

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

Re: **Minor Amendment – Application for New Earth Station Authorization (FCC File No. SES-LIC-20200610-00614); GUSA Licensee LLC – Clifton, TX**

Dear Mr. Sullivan:

GUSA 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 permanent authority for the operation of a new, second-generation feeder link earth station antenna in Clifton, Texas.² With this minor amendment, Globalstar requests permanent authority to use this proposed earth station antenna to transmit a new waveform over its 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 this additional gateway earth station antenna in Clifton on June 10, 2020. As described in that filing, grant of permanent authority for this second-generation gateway 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

¹ 47 C.F.R. § 25.116.

² See Application of GUSA Licensee LLC, FCC File No. SES-LIC-20200610-00614 (June 10, 2020) (“June Application”); *Satellite Communications Services re: Satellite Radio Applications Accepted for Filing*, Public Notice, Report No. SES-02306 at 3-4 (Sept. 30, 2020). Globalstar is currently operating this proposed gateway earth station antenna in Clifton, Texas (call sign E202040) on a temporary basis, pursuant to Special Temporary Authority (“STA”) granted by the Commission. See FCC File No. SES-STA-20200804-00819 (indicating Commission grant of STA extension on September 23, 2020).

systems from an RF perspective, and will comply with all applicable Commission regulations. Given the benefits of these second-generation earth station antennas, Globalstar plans to deploy and operate these antennas at its Clifton facility and its other U.S. gateway locations over the next one to two years.

Globalstar's proposed gateway antenna in Clifton will support all the carriers that are currently supported by Globalstar's existing Clifton gateway facilities. In addition, as indicated above, Globalstar with the instant minor amendment now seeks permanent authority to use this proposed earth station antenna to transmit a new waveform over its MSS network. Globalstar is currently transmitting this waveform from the proposed gateway antenna (call sign E202040) on a temporary basis.³ 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. 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 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.⁴

Expedient grant of the instant amended 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

³ See FCC File No. SES-STA-20200804-00819.

⁴ As described in Schedule B to both the June Application and the instant amendment, permanent authorization of Globalstar's second-generation earth station antenna will permit a total EIRP of 68.4 dBW under call sign E990337. See Response to FCC Form 312, Schedule B, Question E28.