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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 New Earth Station Authorization (FCC File No. SES-LIC-20200427-00449); 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 an additional gateway earth station antenna at Clifton, Texas, primarily for testing purposes.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. Transmission of this waveform should improve and enhance Globalstar’s safety-of-life MSS offerings.

Globalstar submitted its application for this additional gateway antenna in Clifton on April 27, 2020. As described in that filing, authorization of this antenna will provide significant benefits for Globalstar’s MSS network. While this additional gateway earth station antenna may support some commercial traffic, Globalstar intends to use this gateway antenna primarily for the development and testing of new products and technologies, as well as for validating repaired equipment and software upgrades. With an antenna dedicated to testing and validation,

¹ 47 C.F.R. § 25.116.

² See Application of GUSA Licensee LLC, FCC File No. SES-LIC-20200427-00449 (Apr. 27, 2020). Globalstar is currently operating this proposed gateway earth station antenna in Clifton, Texas (call sign E201992) on a temporary basis, pursuant to Special Temporary Authority (“STA”) granted by the Commission. See FCC File No. SES-STA-20200804-00831; *Satellite Communications Services Information re: Actions Taken*, Public Notice, Report No. SES-02298 at 29 (Sep. 2, 2020) (“*September STA Grant*”). On October 13, 2020, GUSA Licensee LLC requested a 60-day extension of this existing STA. See FCC File No. SES-STA-20201019-01143.

Globalstar can carry out such activity without affecting existing operational systems at its commercial gateways. This testing capacity is critical. Before Globalstar can roll out new services and applications and incorporate repaired equipment and upgraded software into its gateways and other commercial systems, thorough testing must be performed at the subsystem level, at the system level using loopback simulators, and finally over the air.

From a hardware and RF perspective, this additional gateway earth station antenna is identical to Globalstar's existing, licensed gateway earth station antennas in Clifton (call signs E970199, E000342, E000343, and E000344). The proposed antenna has the same manufacturer and is the same model number (ALCATEL 9775) as Globalstar's other Clifton earth station antennas. Accordingly, this gateway earth station antenna will have exactly the same operational configuration and technical parameters as Globalstar's other Clifton gateway antennas, and will support all the carriers that are currently supported by Globalstar's existing Clifton gateway facilities. Globalstar's proposed gateway antenna will comply with all applicable Commission regulations.

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 E201992) 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.

³ See note 2 *supra*; September STA Grant.

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Expeditious 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