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February 10, 2006

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VIA HAND DELIVERY

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

**Re: Globalstar USA, LLC Clifton Earth Station/IOT Antenna Application,
File No. SES-LIC-20050825-01183**

Dear Ms. Dortch:

Iridium Satellite LLC (“Iridium”), by its attorneys and pursuant to Section 25.154(b) of the rules of the Federal Communications Commission (“FCC” or “Commission”), is writing to express its concerns regarding the above-referenced earth station application (“Application”) of Globalstar USA, LLC (“Globalstar”).¹ Although Iridium recognizes the need for Globalstar to test its spare satellites, Iridium is concerned that Globalstar’s operations, as described in the Application and supplemental January 27, 2006 letter, could cause harmful interference to Iridium’s operations.

Globalstar proposes to conduct in-orbit testing and other “maintenance and stationkeeping” activities. In particular, Globalstar plans to transmit a signal with a maximum e.i.r.p. of 24 dBW/4 kHz in the 1610-1618.725 MHz band, of which 1618.25-1618.725 MHz is shared with Iridium. As Globalstar acknowledges, this signal is significantly greater than that typically transmitted from a Globalstar handset transceiver and would be 39 dB in excess of the -15 dB(W/4kHz) applied to mobile earth stations under the Commission’s rules and ITU Radio Regulations.² The test signal would result in an interference-to-noise ratio of over 34 dB to

¹ Section 25.154(b) permits the Commission to classify as “informal objections” any pleadings that are not filed in accordance to the filing deadlines that govern Part 25 satellite applications. 47 C.F.R. §25.154(b) (classifying as informal objections “any pleading not filed in accordance with” the filing deadlines in Section 25.154(a)). Although Globalstar’s initial application was filed in August 2005, Iridium became aware of the full scope of Globalstar’s proposed operations only after Globalstar submitted additional information regarding the Application on January 27, 2006. See Letter from Josh L. Roland, Counsel to Globalstar, to Marlene H. Dortch, Secretary, FCC, Re: IB File No. SES-LIC-20050825-01183 – Globalstar USA, LLC Clifton Earth Station/ IOT Antenna Application (filed Jan. 27, 2006) (“January 27 Letter”).

² Application, Exhibit B (Request for Waiver and Additional Technical Details) at 2. See 47 C.F.R. § 2.106 note 5.364; ITU Radio Regulations, Edition of 2004 at Article 5, No. 5.364.

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Iridium's operations, which would be sufficient to eliminate an Iridium call that was on the same frequency.³

Globalstar concedes that it must "operate the [proposed] earth station on a non-interference basis," and that it may not harm "operations in the 1610-1618.725 MHz band and adjacent bands."⁴ However, the Application provides no detail on the timing and frequency of Globalstar's proposed transmissions. Furthermore, the Application fails to propose any mechanism by which Iridium could monitor and notify Globalstar of any interference. Globalstar has not sought to coordinate the proposed operations with Iridium, even though standard industry practice is to initiate coordination of IOT operations prior to requesting FCC authority. It also appears that Globalstar has not submitted the frequency coordination report required by the FCC's rules.⁵

In order to ensure that Globalstar's proposed operations do not cause harmful interference, Iridium respectfully requests that the Commission permit Globalstar to operate only on an as-needed, special temporary authority basis, consistent with recent grants of authority for IOT.⁶ Iridium further requests that the Commission condition any grant of authority to Globalstar upon completion of a coordination agreement with Iridium. In the alternative, Iridium requests that the Commission restrict Globalstar's operations to frequencies not shared with Iridium, and require Globalstar to provide prior notice (at least 48 hours) of operations adjacent to Iridium frequencies, with access to real-time contact with Globalstar personnel during the testing period.

³ In addition, the link budget provided to the Commission in the January 27 letter shows that the downlink is at 6.98 GHz, even though the Application clearly states that the downlink is to be at 2.4 GHz.

⁴ Application, Exhibit B at 3. Globalstar further concedes that it must "accept any interference that Iridium may cause with regard to the use of the 1618.25-1618.725 MHz band." *Id.* at 1.

⁵ Application, Form 312 Schedule B, Response to Q. E18.

⁶ Given the "occasional" nature of the service, it is not clear why Globalstar needs a permanent authorization rather than an STA. The Commission typically issues temporary authority for a limited number of days for such testing. *See, e.g. Columbia Communications Corporation*, 20 FCC Rcd 1863, 1869 (2005) (¶ 17) (granting STA to conduct in-orbit testing for a 60-day period, subject to conditions that the licensee coordinate its test operations with all potentially affected operating satellite networks, cause no harmful interference to any lawfully operating radiocommunications systems, and cease operations immediately upon notification of such harmful interference).

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Please direct any questions regarding this matter to the undersigned.

Sincerely,

/s/ R. Michael Senkowski

R. Michael Senkowski
Counsel to Iridium Satellite LLC

cc: Scott Kotler
William Adler
Josh L. Roland

