

Federal Communications Commission Washington, D.C. 20554

January 18, 2007

Josh L. Roland Wilmer Cutler Pickering Hale & Dorr LLP 1875 Pennsylvania Avenue, NW Washington, DC 20006

Re:

Call Sign: E030266

File No. SES-LIC-20050825-01183

Dear Mr. Roland:

On August 25, 2005, Globalstar USA, LLC (Globalstar USA) filed the above-referenced application to license a fixed earth station in Clifton, Texas that would transmit in the 1610-1618.725 MHz band for in-orbit testing (IOT). We seek additional information in order to complete review of the application.

In Exhibit D of the application, Globalstar USA states that the Clifton IOT earth station was used for initial checkout of payload performance following the launch of the Globalstar satellites in 1998 and 1999 and that Globalstar USA plans to use the IOT station for that purpose again when ground spares are launched. Globalstar USA also asserts that the IOT facility "has proven extremely useful" for the additional function of measuring gain drift in the Globalstar satellite transponders. Please clarify this assertion. In addition, if the IOT station has not been used since the completion of initial in-orbit testing of the current Globalstar satellites, why does Globalstar USA now believe that operation of the IOT station is necessary for on-going satellite maintenance?

The referenced application indicates that the IOT station will receive unmodulated downlink transmissions in the 2483.5-2500 MHz band. However, the link budget submitted on January 27, 2006 as supplementary information indicates that the IOT downlink transmissions will be on a frequency of 6.98 GHz. Please explain the discrepancy and provide link budgets for any additional links that Globalstar USA intends to utilize.

Furthermore, we request an explanation on the necessity of the proposed IOT station transmissions in portions of the 1610-1621.35 MHz band that have either been designated or proposed for sharing with the Iridium Big LEO system.

The referenced application may be subject to dismissal pursuant to Section 25.112(c) of the Commission's rules if a response to this inquiry is not filed by February 19, 2007.

Sincerely,

Scott A. Kotler

Chief, Systems Analysis Branch

Deat A. Kotler

Satellite Division

International Bureau

cc: R. Michael Senkowski

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