

LAWLER, METZGER, KEENEY & LOGAN, LLC

1717 K STREET, NW
SUITE 1075
WASHINGTON, D.C. 20006

STEPHEN J. BERMAN

PHONE (202) 777-7700
FACSIMILE (202) 777-7763

April 27, 2020

Via Electronic Filing

Tom Sullivan
Chief, International Bureau
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: **Application for New Earth Station Authorization – Clifton, TX
GUSA Licensee LLC**

Dear Mr. Sullivan:

GUSA Licensee LLC (together with its parent Globalstar, Inc., “Globalstar”), pursuant to Section 25.115 of the Commission’s rules, hereby requests permanent authority for the operation of an additional gateway earth station antenna at Clifton, Texas, primarily for testing purposes.¹ From a hardware and RF perspective, the proposed earth station antenna is identical to Globalstar’s existing, licensed gateway earth station antennas in Clifton.²

Grant of this application will provide significant benefits for Globalstar’s mobile satellite service (“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, 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.

¹ 47 C.F.R. § 25.115.

² On March 30, 2020, GUSA Licensee LLC requested a 60-day Special Temporary Authority in order to initiate operation of this proposed gateway earth station antenna on a temporary basis. The Commission subsequently granted this request. *See* FCC File No. SES-STA-20200330-00348; *Satellite Communications Services Information re: Actions Taken*, Public Notice, Report No. SES-02258 at 51 (Apr. 15, 2020).

Mr. Tom Sullivan

April 27, 2020

Page 2

As indicated above, 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) from a hardware and RF perspective. 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 additional gateway antenna will comply with all applicable Commission regulations. Globalstar provides the relevant technical parameters for this antenna in Schedule B of this application.

Expeditious grant of the instant 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