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March 23, 2023

Via Electronic Filing

Tom Sullivan
Chief, International Bureau
Federal Communications Commission
45 L Street NE
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,¹ hereby requests permanent authority for the operation of an additional second-generation gateway earth station antenna in Clifton, Texas, primarily for testing purposes.² Globalstar has already obtained authority to operate two second-generation feeder link earth station antennas at its Clifton gateway site on a permanent basis,³

¹ 47 C.F.R. § 25.115.

² Globalstar is concurrently applying for permanent authority for an additional second-generation gateway earth station antenna at its Clifton gateway site that will also be operated primarily for testing purposes.

³ *Satellite Communications Services Information re: Actions Taken*, Public Notice, Report No. SES-02501 at 11-13 (Sept. 21, 2022) (Clifton-1); *Satellite Communications Services Information re: Actions Taken*, Public Notice, Report No. SES-02357 at 2-3 (Apr. 21, 2021) (Clifton-2). Globalstar also has two pending, unopposed applications to operate additional second-generation antennas in Clifton. GUSA Licensee LLC, Application for Modification of Earth Station Authorization, IBFS File No. SES-MOD-20220623-00688 (June 23, 2022) (Clifton-3); GUSA Licensee LLC, Application for New Earth Station Authorization, IBFS File No. SES-LIC-20200610-00614 (June 10, 2020) (Clifton-7). Globalstar currently operates these proposed earth station antennas pursuant to STAs granted on September 29, 2022 and January 13, 2023. *Satellite Communications Services Information re: Actions Taken*, Public Notice, Report No. SES-02534 at 4 (Jan. 18, 2023) (Clifton-3); *Satellite Communications Services Information re: Actions Taken*, Public Notice, Report No. SES-02505 at 11 (Oct. 5, 2022) (Clifton-7).

and has received or requested permanent authority to operate second-generation antennas at its five other U.S. gateway locations.⁴

Grant of this application will yield significant public interest benefits. As an initial matter, Globalstar's second-generation earth station antennas provide substantial operational value for its mobile satellite service ("MSS") network. Globalstar's second-generation earth station antennas are 6-meter dishes with radomes, manufactured by Cobham SATCOM. These antennas are more efficient than Globalstar's first-generation transceivers, requiring less power and only minimal maintenance. These second-generation facilities also provide superior satellite-tracking capability, relying on state-of-the-art auto-track technology.

Notably, the proposed gateway earth station antenna, in conjunction with the additional second-generation antenna being concurrently proposed (*see* note 2 *supra*), will provide a comprehensive gateway test bed capability in Clifton for testing typical gateway operation with multiple LEO satellites. Two second-generation test antennas are necessary for this Globalstar test bed. There are usually two or three Globalstar satellites simultaneously in view of a gateway, and the deployment of two second-generation test antennas will enable the simultaneous testing of two satellites and their respective hand-off capabilities, a crucial feature of Globalstar's Big LEO MSS system.⁵

These second-generation test antennas will be utilized for the development of new products and technologies, as well as for validating repaired equipment and software upgrades. With antennas dedicated to testing and validation, such activity can be carried out without affecting existing operational systems at Globalstar's commercial gateways. This testing capacity is critical. Before new services and applications can be rolled out and repaired equipment and upgraded software incorporated into Globalstar's 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. Grant of the instant application will facilitate this required testing.

⁴ See, e.g., *Satellite Communications Services Information re: Actions Taken*, Public Notice, Report No. SES-02359 at 8-10 (Apr. 28, 2021) (Las Palmas, PR); *Satellite Communications Services Information re: Actions Taken*, Public Notice, Report No. SES-02380 at 7-8 (July 7, 2021) (Naalehu, HI); *Satellite Communications Services Information re: Actions Taken*, Public Notice, Report No. SES-02498 at 10-12 (Sept. 7, 2022) (Wasilla, AK); *Satellite Communications Services Information re: Actions Taken*, Public Notice, Report No. SES-02520 at 8-10 (Nov. 23, 2022) (Sebring, FL); GUSA Licensee LLC, Application for New Earth Station Authorization, IBFS File No. SES-LIC-20201026-01177 (Oct. 26, 2020) (Reno-1).

⁵ Globalstar in 2021 was granted permanent authority to operate one first-generation earth station antenna in Clifton primarily for testing purposes, but it now requires the operation of two additional second-generation antennas to meet the key goals of its Clifton test bed facility. *Satellite Communications Services Information re: Actions Taken*, Public Notice, Report No. SES-02400 at 4-5 (Sept. 15, 2021).

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Globalstar's proposed second-generation antenna complies with all applicable Commission regulations. As required by the Commission's rules, Globalstar provides the relevant technical parameters of this antenna in Schedule B of the instant application.⁶

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: Kerry Murray
Anthony Asongwed

⁶ GUSA Licensee LLC has previously obtained an FAA coordination number from the FAA's WebFCR site that is applicable to its pending applications for new earth station antenna authorizations in Clifton (*see* note 3 *supra*): NG T221058. This coordination number should also apply to the instant application.