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June 10, 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 Globalstar’s new, second-generation feeder link earth station antenna in Clifton, TX.<sup>1</sup> Globalstar plans to deploy and operate second-generation gateway earth station antennas at its Clifton facility and its other U.S. gateway locations over the next one to two years.

The Commission first granted a sixty-day Special Temporary Authority (“STA”) for operation of Globalstar’s prototype second-generation gateway antenna in Clifton in December 2019, but the testing and validation of this earth station antenna was unfortunately delayed by unforeseen software issues and deployment issues related to the Covid-19 pandemic.<sup>2</sup> Following remotely conducted troubleshooting activity, Globalstar began testing and validating this antenna in late April. Once fully validated, this second-generation antenna will become operational in Clifton and carry an appropriate share of Globalstar’s mobile satellite service (“MSS”) traffic, pursuant to Globalstar’s existing STA.

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<sup>1</sup> 47 C.F.R. § 25.115.

<sup>2</sup> Application for Special Temporary Authority of GUSA Licensee LLC, IBFS File No. SES-STA-20191122-01542 (filed Nov. 22, 2019); *Satellite Communications Services Information re: Actions Taken*, Public Notice, Report No. SES-02227 at 63 (Dec. 18, 2019). Globalstar subsequently filed for sixty-day STA extensions on February 4, 2020, and April 17, 2020. See Application for Special Temporary Authority of GUSA Licensee LLC, IBFS File No. SES-STA-20200204-00122 (filed Feb. 4, 2020); *Satellite Communications Services Information re: Actions Taken*, Public Notice, Report No. SES-02245 at 63 (Feb. 26, 2020); Application for Special Temporary Authority of GUSA Licensee LLC, IBFS File No. SES-STA-20200417-00421 (filed Apr. 17, 2020). Globalstar’s April 17 STA extension request remains pending.

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Going forward, grant of permanent authority for these antenna operations will yield significant operational benefits for its MSS network. Globalstar's second-generation earth station antennas are 6-meter dishes with radomes, manufactured by Seatel. These antennas will be more efficient than Globalstar's existing transceivers, requiring less power and only minimal maintenance. These second-generation facilities will also provide superior satellite-tracking capability, relying on state-of-the-art auto-track technology. These antennas will be similar to Globalstar's current gateway systems from an RF perspective, and will comply with all applicable Commission regulations. As required by the Commission's rules, Globalstar provides the relevant technical parameters of its second-generation antenna in the instant application.

Please do not hesitate to contact me with any questions.

Respectfully submitted,

/s/ Stephen J. Berman

Stephen J. Berman

cc: Paul Blais