

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
<b>GLOBALSTAR LICENSEE LLC, GUSA LICENSEE LLC, AND GCL LICENSEE LLC</b>	)	
	)	
Application for Modification of Nongeostationary Mobile Satellite Service System License (S2115) to Launch a Second- Generation System	)	File No. SAT-MOD-20080904-00165
	)	
Application for Modification of Mobile Satellite Service Earth Station Licenses and Mobile Earth Terminal Licenses to Authorize Communications with Second-Generation System and to Incorporate Previously-Granted Ancillary Terrestrial Component Authority	)	File No. SAT-AMD-20091221-00147
	)	
Application For Space And Earth Station	)	File Nos.
	)	SES-MFS-20091221-01615 (E050097)
	)	SES-MFS-20091221-01616 (E050098)
	)	SES-MFS-20091221-01617 (E050099)
	)	SES-MFS-20091221-01618 (E050100)
	)	SES-MFS-20091221-01614 (E050345)
	)	SES-MFS-20091221-01613 (E050346)
	)	SES-MFS-20091221-01612 (E050347)

**AMENDMENT TO APPLICATION FOR MODIFICATION OF MOBILE  
SATELLITE SERVICE EARTH STATION AND MOBILE EARTH TERMINAL  
LICENSES**

Globalstar Licensee LLC (“Globalstar”)<sup>1</sup> hereby amends the above captioned application filed on December 21, 2009 (“Application”) that seeks to modify its earth station and mobile earth terminal licenses to permit communication with its French-registered second generation satellites, as well as ongoing modifications to the operations of its U.S.-licensed satellites that are necessary to provide for the transition to its second-generation constellation. In this amendment to the Application,<sup>2</sup> Globalstar seeks authority for all of the antennas at Globalstar’s earth stations in Sebring, Florida and Wasilla, Alaska to receive transmissions from its first- and second-generation satellites in the 7025-7055 MHz band on an unprotected basis, as it is currently authorized to do with respect to its Texas and Puerto Rico earth stations on a protected basis.

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<sup>1</sup> Globalstar Licensee LLC is the authorized licensee of the Globalstar satellite constellation (call sign S2115). An affiliated company, GUSA Licensee LLC, holds licenses for Globalstar’s earth station gateways located in the United States and a blanket license for the operation of Globalstar mobile earth station terminals, and is responsible for the provision of Globalstar MSS services to end users in the United States. For purposes of this application, Globalstar Licensee LLC and GUSA Licensee LLC are referred to collectively as “Globalstar.”

<sup>2</sup> This amendment is to be construed together with previous recent amendments filed by Globalstar regarding operation of its Sebring, FL earth stations. *See* SES-AMD-20101012-01278 (filed Oct. 12, 2010 requesting, *inter alia*, T&C authority for E050097) and SES-AMD-20101025-01328, SES-AMD-20101025-01327, SES-AMD-20101025-01326 (filed Oct. 25, 2010 requesting T&C authority for E050098, E050099, and E050100, respectively).

Authority for MSS operations between 7025-7055 MHz has been the subject of prior Commission proceedings,<sup>3</sup> including a still-pending Petition for Clarification filed by Globalstar (“Petition”) in 2007.<sup>4</sup> As explained in the Petition, Globalstar’s first- and second-generation satellites are hard-wired to use 180 MHz of spectrum in the 6875-7055 MHz band. If Globalstar is denied the use of frequencies between 7025-7055 MHz at Sebring and Wasilla, Globalstar’s end users, including numerous public safety users, would experience significant degradation of service with no offsetting benefit. Globalstar’s systems are hard-wired to have specific uplink beams from user terminals pair with downlink beams to the gateways; four uplink beams correspond with the downlink spectrum between 7025 and 7055 MHz. Denying use of these downlink beams would not create only a capacity issue,<sup>5</sup> but also would result in significant degradation in quality of service for *all* users. Specifically, denying the affected downlink beams would

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<sup>3</sup> See Report and Order, *Amendment of Parts 2, 25 and 97 of the Commission's Rules with Regard to the Mobile-Satellite Service Above 1 GHz*, 17 FCC Rcd 2658 (2002); Memorandum Opinion and Order, *Amendment of Parts 2, 25 and 97 of the Commission's Rules with Regard to the Mobile-Satellite Service Above 1 GHz*, 18 FCC Rcd. 6897 (2003). See also Order and Authorization, *GUSA Licensee, LLC – Applications to operate four new feeder link earth stations in Sebring, Florida using the 5 and 7 GHz frequency bands*, 22 FCC Rcd 61 (2007) (“Sebring Authorization Order”); Order and Authorization, *GUSA Licensee, LLC – Applications to operate four new feeder link earth stations in Wasilla, Alaska using the 5 and 7 GHz frequency bands*, 22 FCC Rcd 66 (2007) (“Wasilla Authorization Order”).

<sup>4</sup> Petition of GUSA Licensee LLC and Globalstar Inc. for Clarification, *GUSA Licensee, LLC – Applications to operate four new feeder link earth stations in Sebring, Florida using the 5 and 7 GHz frequency bands* (File Nos. SES-LIC-20050617-00768, SES-LIC-20050617-00769, SES-LIC-20050617-00770, SES-LIC-20050617-00771), *GUSA Licensee, LLC – Applications to operate four new feeder link earth stations in Wasilla, Alaska using the 5 and 7 GHz frequency bands* (File Nos. SES-LIC-20051122-01631, SES-LIC-20051122-01632, SES-LIC-20051122-01633) (filed Feb. 5, 2007) (“Petition”).

<sup>5</sup> See Sebring Authorization Order, 22 FCC Rcd at 65 ¶ 9; Wasilla Authorization Order, 22 FCC Rcd at 70 ¶ 9.

create “intermittent holes” in the satellite uplink coverage since user terminals would fail in their attempts to establish connections by utilizing the uplink beams corresponding to the 7025-7055 MHz downlink band. Without the 7025-7055 MHz downlink band, users’ calls would also be dropped whenever they moved into view of an uplink beam whose corresponding downlink beam is not available. In addition, the Sebring and Wasilla earth stations would be limited in their ability to process the simplex and SPOT SOS transmissions received in the affected uplink beams. This limitation could result in a failure by the earth stations to receive simplex transmissions – a particularly dire consequence since the simplex devices are intended for use in life threatening situations. Overall, the consequences of not being able to use the 7025-7055 MHz band at these earth stations would be particularly harmful given that Globalstar expects increased traffic with the improvement in quality and capabilities resulting from deployment of its second-generation constellation.

In recognition of the fact that the 7025-7055 MHz segment is licensed to other users on a primary basis, Globalstar requests authority to receive transmissions in that segment on an unprotected basis at the Sebring and Wasilla gateways and to accept interference from licensed operations, while ensuring that its operations do not cause interference to such licensees.<sup>6</sup> As noted above, Globalstar uses this segment from its Clifton and Puerto Rico earth stations, and that use has not caused any issues to Globalstar’s knowledge.

The information required by sections 25.114(d) and 25.143 of the Commission’s rules in order to obtain authority for U.S.-based earth stations to communicate with the

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<sup>6</sup> See Petition at 5-7.

foreign-registered satellites<sup>7</sup> is provided in the December 2009 application.<sup>8</sup> The Sebring, FL and Wasilla, AK earth stations comply with all applicable Commission rules for earth station operation.

\* \* \*

For the reasons stated above, Globalstar requests that the Commission grant its application, as amended herein.

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<sup>7</sup> See Report and Order, *Amendment of the Commission's Regulatory Policies to Allow Non-U.S. Licensed Space Stations to Provide Domestic and International Satellite Service in the United States*, 12 FCC Rcd 24094, 24175-76 ¶¶ 189-192 (1997); First Report and Order and Further Notice of Proposed Rulemaking in IB Docket No. 02-34, and First Report and Order in IB Docket No. 02-54, *Amendment of the Commission's Space Station Licensing Rules and Policies*, 18 FCC Rcd 10760, 10872-73 ¶¶ 300-302 (2003).

<sup>8</sup> See File No. SAT-AMD-20091221-00147, Narrative at 13-21.

Respectfully submitted,

*/s/ Samir C. Jain*

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November 5, 2010

### **Engineering Certification**

I hereby certify under penalty of perjury that I am the technically qualified person responsible for preparation of the engineering information contained in the foregoing “Amendment To Application For Modification Of Mobile Satellite Service Earth Station And Mobile Earth Terminal Licenses” (“Application Amendment”); that I am familiar with the relevant sections of the FCC’s rules referred to in the Application Amendment; and that the technical information set forth in the Application Amendment is true and correct to the best of my knowledge and belief.

Signed this 5th day of November, 2010

/s/ Paul A. Monte

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Paul A. Monte,  
Vice President, Engineering & Product Development  
Globalstar, Inc.