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June 30, 2009

Filed Electronically

Ms. Marlene H. Dortch
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: Call Sign E960132
File Nos. SES-MOD-20081223-01705 and
SES-AMD-20090518-00598**

Dear Ms. Dortch:

Iridium Satellite LLC hereby responds to the informal comments filed by Globalstar, Inc., Globalstar Licensee LLC, and GUSA Licensee LLC (collectively, "Globalstar") on June 12, 2009, concerning the above-referenced minor modification notification filed by Iridium.¹

Iridium's notification informed the Commission that Iridium has modified the operation of its mobile earth stations, which are licensed on a blanket basis, by adding an emission designator (667KQ7W) and a directional antenna. As demonstrated in the notification, the terminals employing the new emission designator and directional

¹ Globalstar ostensibly was commenting on a clarification Iridium submitted on May 13, 2009, but in fact Globalstar's comments addressed aspects of Iridium's initial filing, which was submitted on December 23, 2008, and did not address the May 13 clarification. To the extent leave is needed to file this response, it is hereby requested.

antenna are operated so as to not increase interference potential above previously-authorized levels.

Globalstar states that it has “no objection” to Iridium’s minor modification so long as “the carrier frequencies [covered by the minor modification] are centered to create enough guardband between the lower edge of the carrier’s occupied band and the edge of the shared band with Globalstar at 1618.725 MHz.” Globalstar claims that a guard band is required by virtue of ETSI Standard EN 301 441.

Globalstar’s suggestion for a guard band has no basis in any Commission rule or policy; the Commission has not adopted ETSI Standard EN 301 441. Accordingly, Globalstar’s suggestion should be rejected. More specifically:

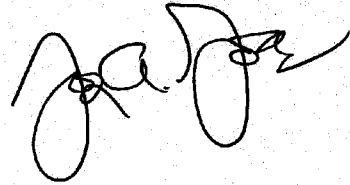
- The Commission has adopted out-of-channel emission limits, not guard bands, to protect adjacent channels. Iridium is in full compliance with these limits. If Globalstar is dissatisfied with the Commission’s emission limits, it needs to petition for a rulemaking.
- The Commission determined that Iridium’s mobile earth stations comply with applicable limits when it granted Iridium a blanket license. Iridium’s minor modification notification simply informs the Commission of an additional mode of operation that has no greater interference potential than the modes of operation covered by Iridium’s license. There is no basis for requiring a guard band in these circumstances. Iridium, moreover, has stated that the new mode of operation will be limited to the frequency range assigned exclusively to Iridium above 1618.725 MHz.
- Iridium’s mobile earth station license is limited to operations in the United States, where (as discussed above) ETSI Standard EN 301 441 is inapplicable.² To the extent that Iridium applies for mobile earth station licenses in other countries, it will be up to the regulatory authorities in those countries to determine the basis for protecting adjacent channels. Iridium will, of course, provide services in other countries in accordance with the terms of the authorizations it receives to access those countries.

² ETSI Standards are not global standards, and rather are applicable only in areas where they have been adopted.

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For all of the above reasons, Globalstar's suggestion for a guard band should be rejected. Please direct any questions concerning this matter to the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read "Joe Godles", with a stylized flourish at the end.

Joseph A. Godles
Attorney for Iridium

cc (via e-mail):

Kathryn Medley, FCC
Frank Peace
Hsing Liu, FCC
William Adler, Globalstar