



L. Barbee Ponder IV

General Counsel & Vice President Regulatory Affairs

November 13, 2013

Via Electronic Filing

Mindel De La Torre
Chief, International Bureau
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: Information Regarding New Simplex Telemetry Unit
GUSA Licensee LLC
Call Sign E970381 – IBFS File No. SES-MOD-20110303-00241

Dear Ms. De La Torre:

Globalstar, Inc., on behalf of its wholly-owned subsidiary GUSA Licensee LLC (together “Globalstar”), hereby provides the International Bureau with relevant information regarding a new simplex Telemetry device, the “SPOT Trace,” that will be operated under Globalstar’s above-captioned blanket license for mobile earth stations (“MES”) in the Big LEO mobile satellite service (“MSS”) band.

Globalstar’s existing MES blanket license identifies the manufacturer of authorized Telemetry devices as “Various,” rather than specifying the individual manufacturers of these devices.¹ In its March 3, 2011 application for modification of this blanket license, Globalstar stated that it would identify the individual manufacturers of Telemetry devices in its equipment certification filings.² Rather than certify the SPOT Trace, however, Globalstar recently verified this device under the FCC’s Part 2 verification procedures (discussed further below), which do not

¹ GUSA Licensee LLC, Authorization for Call Sign E970381, File No. SES-MOD-20110303-00241, at 5 (granted Aug. 2, 2011), <http://licensing.fcc.gov/myibfs/displayLicense.do?filingKey=-220150>.

² Application of GUSA Licensee LLC for Modification of Blanket License for Mobile Earth Stations, Call Sign E970381, IBFS File No. SES-MOD-20110303-00241, Attachment Question 43 at 2-3 (March 3, 2011) (“Application for Modification”); see also Public Notice, *Satellite Communications Services Information re: Actions Taken*, Report No. SES-01370, at 9-11 (rel. Aug. 3, 2011) (granting Application for Modification effective Aug. 2, 2011), http://hraunfoss.fcc.gov/edocs_public/attachmatch/DOC-308870A1.pdf.

require an equipment authorization filing with the Commission. Accordingly, Globalstar provides the relevant information on the SPOT Trace in this letter, which should be associated with the license file for Globalstar's MES blanket authorization.

The SPOT Trace is a non-portable earth-station transceiver that is designed for use as an asset tracking device.³ This simplex unit will operate under the "Telemetry" antenna category listed in Globalstar's MES blanket license, which permits the operation of up to 490,000 such Telemetry devices in the United States. The manufacturer of the SPOT Trace is SPOT LLC. This device will operate in a manner consistent with the Commission's Part 25 technical rules and the technical parameters contained in Globalstar's MES blanket license.

As indicated above, Globalstar recently completed the verification process for the SPOT Trace under the procedures contained in Sections 2.951-2.956 of the Commission's rules.⁴ Verification of non-portable Telemetry devices such as the SPOT Trace is permitted under the Commission's 2003 order establishing rules and policies for "Global Mobile Personal Communications by Satellite" ("GMPCS") transceivers.⁵ Pursuant to Sections 2.955 and 2.956 of the FCC's rules, Globalstar has retained the relevant verification records for the SPOT Trace and can make these materials available to the Commission upon request.⁶

³ Section 2.1093(b) of the Commission's rules defines a portable device as a "transmitting device designed to be used so that the radiating structure(s) of the device is/are within 20 centimeters of the body of the user." 47 C.F.R. § 2.1093(b). As an asset tracking unit, the SPOT Trace will not normally operate within close proximity of humans.

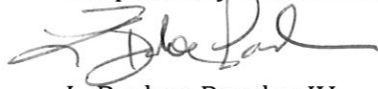
⁴ 47 C.F.R. §§ 2.951-2.956.

⁵ *Amendment of Parts 2 and 25 to Implement the Global Mobile Personal Communications by Satellite (GMPCS) Memorandum of Understanding and Arrangements; Petition of the National Telecommunications and Information Administration to Amend Part 25 of the Commission's Rules to Establish Emission Limits for Mobile and Portable Earth Stations Operating in the 1610-1660.5 MHz Band*, Second Report and Order, 18 FCC Rcd 24423, ¶ 37 (2003) ("[W]e are not requiring certification of non-portable earth-station transceivers. It is neither self-evident nor deducible from the record before us that the current means of regulating operation of such devices are inadequate, and it would disserve the public interest to burden manufacturers, importers, and/or suppliers of such equipment with a superfluous authorization requirement.").

⁶ 47 C.F.R. §§ 2.955, 2.956.

Please do not hesitate to contact me with any questions.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "L. Barbee Ponder IV". The signature is fluid and cursive, with a large initial "L" and "P".

L. Barbee Ponder IV
General Counsel & Vice President Regulatory

Affairs

cc: Paul Blais