

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
)	
Globalstar Licensee LLC)	SAT-MOD-20170411-00061
GUSA Licensee LLC)	SES-MOD-20170422-00422
)	Call Sign: S2115
Application for Modification to Space Station)	
and Earth Station Licenses to Implement a)	
New Ancillary Terrestrial Component (ATC))	
Using Licensed Big LEO Mobile Satellite)	
Service Spectrum)	

COMMENTS OF GPS INNOVATION ALLIANCE

The GPS Innovation Alliance (“GPSIA”),¹ pursuant to Section 25.154(a)² of the Commission’s Rules, submits these comments (“Comments”) addressing one aspect of the above-captioned applications (“Applications”) of Globalstar Licensee LLC, GUSA Licensee LLC, and GCL Licensee LLC (collectively, “Globalstar”) in connection with Globalstar’s planned terrestrial wireless broadband operations.³ In particular, GPSIA asks that Globalstar acknowledge, as part of the application process, that it remains required to meet the emission levels into the 1559-1610 MHz band from ancillary

¹ GPSIA was formed in February 2013 to protect, promote, and enhance use of GPS and GNSS technologies. Members and affiliates of the GPSIA are drawn from a wide variety of fields and businesses reliant on GPS, including transportation, agriculture, construction, surveying, and mapping and public safety. GPSIA members also include organizations representing consumers who depend on GPS in a wide variety of applications including boating and other outdoor activities and in their automobiles, smart phones, and tablets.

² 47 C.F.R. § 25.154(a).

³ The Globalstar Applications request a minor modification of Globalstar’s licenses for its satellite constellation, earth station gateways in the continental United States and Alaska, and blanket license for mobile earth station terminals in the United States. These applications were placed on public notice for comments and petitions to deny on May 24, 2017. See Report No. SPB-270, *Satellite Policy Branch, Applications Accepted for Filing*, DA 17-509 (May 24, 2017). This filing also applies to the related modification application filed by GCL Licensee LLC for Globalstar’s earth station gateway in Puerto Rico (SES- MOD–20170412-00435; call sign E050237) .

terrestrial component (“ATC”) base and user stations it operates in the 2483.5-2495 MHz band to which it previously agreed with the National Telecommunications and Information Administration (“NTIA”).

35. In 2008, the Commission granted in part Globalstar’s request to modify its authority for an ATC to be operated in conjunction with the Globalstar mobile-satellite service system.⁴ In granting the modified authority, the Commission noted that Globalstar agreed with NTIA that it would operate with emission limits different than those specified in the FCC’s rules. Regarding the emissions from ATC end-user stations, in a letter filed on October 30, 2008, Globalstar reported that it agreed in discussions with the NTIA to meet stricter emission limits in the 1559-1610 MHz band. Specifically, Globalstar said that 2483.5-2495 MHz ATC end-user stations placed into service before 2012 will comply with an EIRP density limit for wideband emissions of -90 dBW/MHz and an EIRP density limit of -100 dBW/kHz for narrowband emissions in the 1559-1610 MHz band. The 2483.5-2495 MHz ATC end-user stations placed into service after 2012 will comply with an EIRP density limit for wideband emissions of -95 dBW/MHz and an EIRP density limit of -105 dBW/kHz for narrowband emissions in the 1559-1610 MHz band.

36. Regarding the emissions from ATC base stations, in a letter filed on October 30, 2008, Globalstar reported that it agreed in discussions with the NTIA to meet stricter emission limits in the 1559-1610 MHz band. Specifically, Globalstar said that 2483.5-2495 MHz ATC base stations will comply with a EIRP density limit for wideband emissions of -100 dBW/MHz and a EIRP density limit of -110 dBW/kHz for narrowband emissions in the 1559-1610 MHz band.⁵

The FCC’s grant of ATC authority to Globalstar was thus conditioned on Globalstar’s compliance with this specified out-of-band emission limit for its ATC end user stations and ATC base stations.⁶

Globalstar has not addressed this commitment in its above-captioned applications.

GPSIA therefore requests that Globalstar reconfirm that the operations contemplated by

⁴ *Globalstar Licensee LLC*, Order and Authorization, FCC 08-254, 23 FCC Rcd 15975 (2008) (“*Globalstar ATC Order*”).

⁵ *Id.* at paras. 35 and 36 (footnotes omitted), citing Letter from William Adler, Vice President—Legal and Regulatory Affairs, Globalstar, to Marlene H. Dortch, Secretary, FCC, dated October 30, 2008.

⁶ *See id.* at 15992 (ordering paragraphs 41.(b) and (c)).

the applications for modification remain subject to these commitments. If Globalstar specifically acknowledges this requirement and condition on its authority, GPSIA does not object to favorable action by the Commission on the above-captioned applications. Reaffirmation that Globalstar remains bound to the limits to which it earlier agreed remains critical to ensuring that planned ATC operations into the 1559-1610 MHz band will not cause unacceptable or harmful interference to GPS and GNSS operations.⁷

Respectfully submitted,

/s/_____

Mark N. Lewellen
GPS INNOVATION ALLIANCE

Dated: June 23, 2017

⁷ The instant comments solely address OOBE-related issues concerning Globalstar's proposed Terrestrial Low Power Service ("TLPS") transmitting exclusively in the 2483.5-2495 GHz segment of the Big Low Earth Orbit ("Big LEO") band. GPSIA reserves the right to separately comment or seek to deny other Globalstar or other proposals that may affect the integrity and utility of GPS and GNSS services to the extent that the Commission proceeds to initiate rulemakings to consider such proposals. In that regard, GPSIA notes that Globalstar has a pending petition before the FCC (filed concurrently with its original TLPS petition) to repurpose the Big LEO band at 1610-1618.725 MHz for terrestrial wireless broadband service. *See* Globalstar Inc., Petition for Rulemaking to Reform the Commission's Regulatory Framework for Terrestrial Use of the Big LEO MSS Band, RM-11685 (filed Nov. 13, 2012).