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July 28, 2020

Via Electronic Filing

Tom Sullivan
Chief, International Bureau
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: **Application for Modification of Earth Station Authorization – Las Palmas, PR
GCL Licensee LLC – Call Sign E990337**

Dear Mr. Sullivan:

Pursuant to Section 25.117 of the Commission’s rules, GCL Licensee LLC (together with its parent Globalstar, Inc., “Globalstar”) hereby requests authority to modify Globalstar’s feeder link earth station antenna operating in Las Palmas, PR, under call sign E990337.¹ Under the proposed modification, Globalstar would operate its second-generation earth station antenna under this call sign. Globalstar plans to install second-generation gateway feeder link antennas at its Las Palmas facility and its other U.S. gateway locations over the next one to two years.²

Grant of permanent authority for Globalstar’s second-generation antenna operations will yield significant operational benefits for its mobile satellite service (“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.

¹ 47 C.F.R. § 25.117.

² On June 30, 2020, the Commission granted a sixty-day Special Temporary Authority (“STA”) for operation of Globalstar’s second-generation earth station antenna in Las Palmas under call sign E990337. *See* Application for Special Temporary Authority of GCL Licensee LLC, IBFS File No. SES-STA-20200508-00514 (filed May 8, 2020); *Satellite Communications Services Information re: Actions Taken*, Public Notice, Report No. SES-02281 at 276 (July 1, 2020).

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Globalstar's second-generation antennas are similar to its current gateway systems from an RF perspective and comply with all applicable Commission regulations. Authorization of Globalstar's second-generation earth station antenna would result in a slight increase in total EIRP for operations under call sign E990337. Specifically, as indicated in Schedule B, E28 of FCC Form 312 and Attachment 2 to this form, total EIRP under this license would increase from 68.0 dBW to 68.4 dBW. As required by the Commission's rules, Globalstar provides the relevant technical parameters of its second-generation antenna in the instant application.³

Please do not hesitate to contact me with any questions.

Respectfully submitted,

/s/ Stephen J. Berman

Stephen J. Berman

cc: Paul Blais

³ Globalstar also proposes to add a new emission designator to its authorization under call sign E990337, for receive-only simplex/SPOT services (emission designator 2M50G7D) (*see* Schedule B, E50 of FCC Form 312). In addition, Globalstar is moving its remote control point location to Covington, Louisiana (*see* Schedule B, E61-E68 of FCC Form 312).