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February 17, 2021

*Via Electronic Filing*

Tom Sullivan  
Chief, International Bureau  
Federal Communications Commission  
45 L Street NE  
Washington, DC 20554

Re: **Application for Modification of Earth Station Authorization – Las Palmas,  
PR; GCL Licensee LLC – Call Sign E990335**

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, Puerto Rico, under call sign E990335.<sup>1</sup> 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. In addition, Globalstar proposes to use this second-generation gateway antenna to transmit a new waveform over its global mobile satellite service (“MSS”) network.<sup>2</sup> Globalstar hopes to use this waveform to improve and augment its safety-of-life MSS offerings.

Grant of permanent authority for Globalstar’s second-generation antenna operations will yield significant operational benefits for its MSS network. Globalstar’s second-generation earth station antennas are 6-meter dishes with radomes, manufactured by Cobham SATCOM. These antennas will be more efficient than Globalstar’s existing transceivers, requiring less power and

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<sup>1</sup> 47 C.F.R. § 25.117.

<sup>2</sup> The Commission granted Globalstar’s current STA for testing of the new waveforms on October 16, 2020. *See* Application for Special Temporary Authority of GCL Licensee LLC, IBFS File No. SES-STA-20200804-00825 (filed Aug. 4, 2020); *Satellite Communications Services Information re: Actions Taken*, Public Notice, Report No. SES-02311 at 31 (Oct. 21, 2020). Globalstar requested an extension of this STA on December 8, 2020, and that request remains pending. *See* Application for Special Temporary Authority of GCL Licensee LLC, IBFS File No. SES-STA-20201208-01311 (filed Dec. 8, 2020).

only minimal maintenance. These second-generation facilities will also provide superior satellite-tracking capability, relying on state-of-the-art auto-track technology.

As required by the Commission's rules, Globalstar provides the relevant technical parameters of its second-generation antenna in the instant application.<sup>3</sup> 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 an increase in total EIRP for operations under call sign E990335. Specifically, as indicated in Schedule B, E40 of FCC Form 312 and in Attachment 2 to Globalstar's response to Schedule B, E15, total EIRP under this license would increase from 68.0 dBW to 72.2 dBW.

Globalstar's proposed, modified gateway antenna in Las Palmas will support all the carriers that are currently supported by its existing Las Palmas gateway facilities. In addition, as indicated above, Globalstar seeks permanent authority to use this proposed earth station antenna to transmit a new waveform over its MSS network. Globalstar is currently transmitting this waveform from this gateway antenna (call sign E990335) on a temporary basis.<sup>4</sup> Use of this waveform will enhance Globalstar's safety-of-life MSS offerings.

Globalstar provides the relevant technical parameters for its transmission of this waveform in its response to Schedule B, Question 50 of FCC Form 312. This new waveform is a burst mode packet data carrier that will support short-messaging data services. The channel bandwidth for this waveform is 4.5 megahertz at 5096-5250 MHz and 200 kilohertz at 6900-7055 MHz.<sup>5</sup> Transmission of the new waveform creates no greater potential for interference than Globalstar's existing operations at 5091-5250 MHz/6875-7055 MHz.

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<sup>3</sup> As indicated in the instant application, Globalstar is moving its remote control point location to Covington, Louisiana (*see* Schedule B, E61-E68 of FCC Form 312).

<sup>4</sup> *See* IBFS File No. SES-STA-20200804-00825; note 2 *supra*.

<sup>5</sup> The proposed transmit emission designator for the new waveform at 5096-5250 MHz under call sign E990335 is 4M50G7D, while the proposed receive emission designators for the new waveform at 6900-7055 MHz are 200KG7D, 230KG7D, and 280KG7D. *See* Schedule B, E50 of FCC Form 312. The addition of three receive emission designators will permit flexible implementation of this new carrier.

Globalstar also proposes to add a new receive emission designator to its authorization under antenna call sign E990335, for receive-only simplex/SPOT services (emission designator 2M50G7D). *Id.*

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Expeditious grant of the instant amended modification application will produce substantial benefits for Globalstar's MSS network and further the public interest. Please do not hesitate to contact me with any questions.

Respectfully submitted,

/s/ Stephen J. Berman  
Stephen J. Berman

cc: Paul Blais