

September 22, 2010

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Ms. Mindel De La Torre  
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Federal Communications Commission  
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Re: **Request for Special Temporary Authority**  
GUSA Licensee LLC  
File No. SAT-AMD-20090221-00147; SES-AFS-20091221-01601; SES-MFS-  
20091221-01615; SES-AFS-20091221-01607  
ITU Designation: HIBLEO-X

Dear Ms. De La Torre:

GUSA Licensee LLC (“Globalstar”) hereby requests Special Temporary Authority under 47 C.F.R. § 25.120 (“STA”) to allow its Commission-licensed earth stations to communicate with its soon-to-be launched second generation satellites while its application for modification of its earth station licenses to provide such authority remains pending.<sup>1</sup> Globalstar requests expedited treatment of its request because its satellites are scheduled to be launched on October 19, 2010, and it will need to engage in test communications beginning on that date.<sup>2</sup> Accordingly, Globalstar requests that the STA be granted for a period of 180 days from October 18, 2010 until April 16, 2011, or until the grant of its pending application to modify its earth station licenses, whichever is sooner.<sup>3</sup>

As explained in its previously filed application, Globalstar has embarked on a transition to its second-generation satellite constellation. This transition involves the launch of 24 new satellites, licensed through France, with the first batch of six satellites scheduled for launch on October 19, 2010, local time in Kazakhstan. Upon launch, Globalstar will require the ability to communicate with those satellites from its Commission-licensed U.S. earth stations. Although Globalstar filed

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<sup>1</sup> See Globalstar Licensee LLC, GUSA Licensee LLC, and GCL Licensee LLC – Application for Modification of Nongeostationary Mobile Satellite Service System License (S2115) To Launch a Second-Generation System; Application For Modification of Mobile Satellite Service Earth Station Licenses and Mobile Earth Terminal Licenses To Authorize Communications with Second-Generation System and To Incorporate Previously-Granted Ancillary Terrestrial Component Authority, File No. SAT-AMD-20090221-00147 (filed Dec. 21, 2009).

<sup>2</sup> See Globalstar, *Go For Launch - Globalstar Announces Satellite Launch Date* (press release), Sept. 7, 2010, available at [http://www.globalstar.com/en/news/pressreleases/press\\_display.php?pressId=629](http://www.globalstar.com/en/news/pressreleases/press_display.php?pressId=629).

<sup>3</sup> Globalstar requests that the STA begin on October 18, 2010 (Central Daylight Time; GMT -5) to enable communication with its satellites since they will be launched from Baikonur, Kazakhstan (GMT +6) on October 19, 2010.

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an application to modify its earth station licenses to provide such authority, that application remains pending. Globalstar understands that the Commission may not act on that application until the French Minister for Economy and Finance, France's satellite regulator, formally approves Globalstar's authorization to operate its service and feeder link frequencies in its current nongeostationary orbit at 1414 km.<sup>4</sup> The French "Agence Nationale de Fréquences" ("ANFR") has indicated that, while Globalstar may launch its satellites as scheduled, under French law, the Ministry may not formally approve Globalstar's authority to operate in the orbital position until November 2010.<sup>5</sup> Globalstar, however, requires the ability to communicate with its satellites during the period after launch to conduct critical in-orbit testing.

Accordingly, Globalstar requests that Commission grant an STA to authorize its existing U.S. earth stations to communicate with the French-registered satellites during this interim period. Globalstar seeks this authorization for telemetry and control and in-orbit test from earth stations located in Clifton, TX and a telemetry and control earth station in Sebring, FL, with technical details provided in the attached exhibit.<sup>6</sup> As indicated, the purpose of such communications will be to allow Globalstar to perform the transponder testing of the launched satellites to affirm the post-launch satellite health, and to verify the performance characteristics of the individual satellites. The public interest will be served by the grant of this STA because in addition to ensuring effective control center communications with launched satellites, the performance of these in-orbit-tests will provide crucial information necessary for the successful deployment of the replacement Globalstar spacecraft to be launched in the coming months.<sup>7</sup> The successful testing of these satellites will accordingly ensure the provision of high quality service to U.S. customers.

Although Globalstar expects that the French Ministry will grant its application in November 2010, and understands that the Commission will be in a position to act on its pending application soon thereafter, out of an abundance of caution, Globalstar requests a 180-day STA until April 16, 2011, or until the grant of its pending application to modify its earth station licenses, whichever is sooner. This term will ensure that Globalstar retains the ability to conduct and complete its satellite testing until all of its formal licenses are granted.

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<sup>4</sup> See Exh. 2 (Letter from Alexandre Vallet, Head, Spectrum/Orbit Resources Dept., Agence Nationale des Fréquences, to Kathryn Medley, Chief, Satellite Engineering Branch, Satellite Division, IB, FCC, Sept. 21, 2010)

<sup>5</sup> *Id.* at 2.

<sup>6</sup> See Exh. 3 (Earth Station Technical Information). A separate technical exhibit is provided for each antenna. As described further in the Clifton, TX IOT antenna technical exhibit, Globalstar requests authority to operate this antenna at a higher power than listed in the Commission's rules solely for the limited purpose and duration of in-orbit testing and not in connection with any commercial service to end users. The International Bureau has previously granted such requests. See, e.g., Application of TerreStar License, Inc., File No. SES-STA-20091102-01408 (granted Jan. 7, 2010).

<sup>7</sup> See Exh. 3 for Clifton TX IOT antenna at 1.

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Please do not hesitate to contact me with any questions.

Respectfully submitted,

*/s/ Samir Jain*

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Encl.