

October 21, 2010

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Ms. Mindel De La Torre
Chief, International Bureau
Federal Communications Commission
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Re: **Request for Special Temporary Authority – 180 Days (Sebring, FL and Clifton, TX)**
GUSA Licensee LLC
File Nos. SAT-AMD-20090221-00147; SES-MFS-20091221-01608; SES-MFS-
20091221-01609; SES-MFS-20091221-01610; SES-MFS-20091221-01611; SES-MFS-
20091221-01615; SES-MFS-20091221-01616; SES-MFS-20091221-01617; SES-MFS-
20091221-01618; SES-STA-20100927-01214
Designation: HIBLEO-4FL (ITU) / S2115 (FCC) and HIBLEO-X (ITU)

Dear Ms. De La Torre:

GUSA Licensee LLC (“Globalstar”) hereby requests 180-day Special Temporary Authority under 47 C.F.R. § 25.120 (“STA”) to allow its Commission-licensed earth stations at Clifton, TX and Sebring, FL to communicate with all of its first and second generation satellites, as well as a slight modification to one of its previously granted STA requests.¹ Globalstar requests expedited treatment of its request because some of its second-generation satellites were launched on October 19, 2010 and it needs to communicate with them using the antennas that are the subject of this request.² Accordingly, Globalstar requests that the STA be granted for a

¹ 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). On October 14, 2010, the Commission granted Globalstar’s STA request to allow communications with its second generation constellation from a single antenna at Sebring, FL (File No. SES-STA-20100927-01214, Call Sign: E050097) and Clifton, TX (File No. SES-STA-20100922-01188, Call Sign: E970199). This STA request seeks authority for the other antennas at those sites to communicate with its second-generation constellation, as well as for all of its antennas at Sebring, FL to communicate with its first-generation satellites.

² See Globalstar, *Globalstar Announces Successful Launch of Six New Second-Generation Satellites* (press release), Oct. 20, 2010, available at <http://www.globalstar.com/en/index.php?cid=7010&pressId=633>.

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period of 180 days from October 27, 2010, or until the grant of its pending application to modify its earth station licenses, whichever is sooner.

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 launched on October 19, 2010. Globalstar's second-generation constellation will consist of its newly launched satellites, as well as eight additional first-generation satellites launched in 2007. As such, Globalstar requires the ability to communicate with all of those satellites from its Commission-licensed U.S. earth stations. Although Globalstar filed 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 second-generation constellation and feeder link frequencies in its current nongeostationary orbit at 1414 km.³ The French "Agence Nationale de Fréquences" ("ANFR") has indicated that, while Globalstar may launch its second-generation satellites as scheduled, under French law, the Ministry may not formally approve Globalstar's authority to operate in the orbital position until November 2010.⁴ Globalstar, however, requires the ability to communicate with all of the satellites in its second generation constellation during the period after launch. In addition, Globalstar requires the ability to communicate with all other operational, test bed, and deorbiting first generation satellites from the Sebring telemetry and command (T&C) antennas to ensure that these satellites are properly deorbited (raised to the highest disposal orbit possible and depleted of all stored energy).

Accordingly, Globalstar submits this request for STA to authorize its existing U.S. earth stations to communicate with its satellites during this interim period.⁵ Globalstar seeks this authorization for various testing, including T&C, communications from earth stations at Clifton, TX and Sebring, FL, with technical details provided in the attached exhibit.⁶ Specifically,

³ 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)

⁴ *Id.* at 1.

⁵ To the extent necessary, Globalstar also requests a waiver of footnote NG172 of the U.S. Table of Frequency Allocations in 47 C.F.R. § 2.106, and Section 25.131(j)(1) of the Commission's rules, 47 C.F.R. § 25.131(j)(1), in connection with reception of space-to-Earth transmissions in the 7025-7055 MHz band.

⁶ See Exh. 3 (Earth Station Technical Information).

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Globalstar requests the authority to utilize multiple antennas at each site to enable T&C of multiple satellites in view simultaneously at a ground location, which is a common occurrence for a LEO satellite constellation. The public interest will be served by the grant of this STA because in addition to ensuring effective control center communications with recently launched and existing satellites, this communication will provide crucial information necessary for the successful deployment of the replacement Globalstar spacecraft to be launched in the coming months. The successful testing, integration, and maneuvering of these satellites will accordingly ensure the provision of high quality service to U.S. customers.

Globalstar also requests a slight amendment to the Commission's STA grant to allow all of the antennas at Sebring, FL to communicate with all of Globalstar's satellites.⁷ The Commission's grant only permits T&C communications with HIBLEO-X constellation satellites. However, because Globalstar's second-generation constellation will integrate eight of its first-generation satellites, and T&C is still required with the remainder of Globalstar's first-generation constellation, Globalstar needs to communicate with both the HIBLEO-X (second-generation) and HIBLEO-4FL / S2115 (first-generation) satellites.

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 an STA for 180 days from October 27, 2010, 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.

Please do not hesitate to contact me with any questions.

Respectfully submitted,

/s/ Samir Jain

Samir Jain
Counsel to GUSA Licensee LLC

Encl.

⁷ See File. No. SES-STA-20100927-01214 (Call Sign E050097) (granted Oct. 14, 2010).