

November 5, 2010

Samir C. Jain

Ms. Mindel De La Torre
Chief, International Bureau
Federal Communications Commission
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Re: **Request for Special Temporary Authority – 180 Days (MET Blanket License)**
GUSA Licensee LLC
File No. SES-MFS-20091221-01602 (E970381)
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 recently launched second-generation satellites to communicate with its mobile earth terminals located within the fifty states, Puerto Rico and the U.S. Virgin Islands.¹ Globalstar requests that the STA be granted for a period of 180 days beginning November 15, 2010, or until the grant of its pending application to modify its mobile earth terminal licenses,² whichever is sooner.

Globalstar’s transition to its second-generation satellite constellation involves the launch of 24 new satellites, licensed through France, with the first batch of six satellites launched on October 19, 2010.³ Globalstar understands that the Commission may not act on its pending Application to modify its blanket mobile earth station license to provide authority to communicate with its second-generation satellites until some time after the French Minister for

¹ Technical about the mobile earth station authority requested is attached hereto as Exhibit 2. Globalstar is authorized to communicate with 1.62 million terminals and currently has approximately 235,000 customers in the United States and its territories.

² See 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, *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*, etc.; File No. SAT-AMD-20090221-00147, etc. (filed Dec. 21, 2009) (“Application”).

³ 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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Economy and Finance, France's satellite regulator, formally approves Globalstar's authorization. Globalstar recently received such authorization from the French government, though it is still pending official publication.

In the interim, the first satellite from the recently launched batch will become operational on or about November 15, 2010. Once that satellite becomes available for commercial service in the rest of the world, Globalstar's simplex devices will automatically transmit to it as it passes over the United States – Globalstar cannot block those transmissions to the satellite when it is operating. Accordingly, pending the Commission's grant of Globalstar's Application, Globalstar requests STA to ensure that these simplex device communications are authorized. Such a grant is in the public interest since it will result in improved service to U.S. customers using Globalstar simplex devices without increased interference or other harmful consequence. These simplex devices include the SPOT Satellite GPS Messenger with SOS functionality utilized in the event of life threatening or other critical emergencies.

Further, Globalstar requests authority for its remaining mobile earth terminals (which are used in connection with duplex services) to communicate with its newly operational second-generation satellite as well. As the Commission is aware, Globalstar has faced significant degradation of full-duplex services provided by its first generation satellites. Enabling all of Globalstar's mobile earth terminals to utilize its second generation satellites as early as possible will enable Globalstar's U.S. customers to enjoy the same improved full-duplex capabilities of their terminals as soon as they are offered to customers in the rest of the world. This too would serve the public interest, especially given Globalstar's numerous public safety users.

Although Globalstar expects that the French Ministry will publish its grant of Globalstar's French license in the near future, 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 STA for 180 days from November 15, 2010, or until the grant of its pending application, whichever is sooner. This term will ensure that Globalstar remains in compliance with its mobile earth terminal communications until all of its authorizations 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.