## WILMERHALE

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Ms. Mindel De La Torre Chief, International Bureau Federal Communications Commission 445 12th St. SW Washington, DC 20554

## Re: Request for Extension of Special Temporary Authority

GUSA Licensee LLC

File Nos. SAT-AMD-20091221-00147; SES-MFS-20091221-01615; SES-MFS-20091221-01616; SES-MFS-20091221-01617; SES-MFS-20091221-01618; SES-AFS-20091221-01607; SES-MFS-20091221-01608; SES-MFS-20091221-01609; SES-MFS-20091221-01610; SES-MFS-20091221-01611; SES-MFS-20091221-01601 ITU Designation: HIBLEO-X

Dear Ms. De La Torre:

GUSA Licensee LLC ("Globalstar") hereby requests a 60-day extension of previously granted Special Temporary Authority<sup>1</sup> ("STA") for ten of its Commission-licensed earth stations to communicate with its launched second-generation satellites while its Application for modification of its earth station licenses to provide such authority remains pending.<sup>2</sup> Globalstar requests expedited treatment of this extension request because its current STA for these earth

<sup>2</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-20091221-00147 (filed Dec. 21, 2009) ("Application").

<sup>&</sup>lt;sup>1</sup> As permitted under 47 C.F.R. § 25.120. The previously granted STA requests were filed under: SES-STA-20101212-01534 (SBRG-1); SES-STA-20101212-01535 (SBRG-2); SES-STA-20101212-01536 (SBRG-3); SES-STA-20101212-01537 (SBRG-4); SES-STA-20100922-01188 (CLFN-1); SES-STA-20101212-01538 (CLFN-2); SES-STA-20101212-01539 (CLFN-3); SES-STA-20101212-01540 (CLFN-4); SES-STA-20101212-01541 (CLFN-5); SES-STA-20101212-01532 (CLFN-IOT). Technical exhibits for these antennas are attached to the instant request.

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stations expired, with one exception, between February 16 and 22, 2011, and Globalstar requires the continued ability to communicate with its satellites from these earth stations for control purposes.<sup>3</sup> Accordingly, Globalstar requests that the STA extensions be granted for a period of 60 days from the date the current STA for these earth stations expired.<sup>4</sup>

As the Commission is aware, Globalstar has embarked on a transition to its secondgeneration satellite constellation. This transition involves the launch of 24 new satellites, with the first batch of six satellites launched on October 19, 2010, and preparations for subsequent launches well under way.<sup>5</sup>

Globalstar understands that, although the Commission has received all the information it requires from Globalstar for processing its Application, certain international coordination issues remain to be resolved before the Commission can act on the Application. Globalstar submits that these issues should not prevent Globalstar from effectively controlling and monitoring its satellites. The public interest justifications for granting this authority remain substantially the same as those provided in the previous requests. In short, the public interest will be served by the grant of these STA requests because they will ensure effective control center communications with launched satellites, and these operations are necessary to ensure the provision of high quality service to U.S. customers.

Please do not hesitate to contact me with any questions.

<sup>5</sup> See Globalstar, Inc., Globalstar Announces Successful Launch of Six New Second-Generation Satellites (press release), Oct. 20, 2010, http://www.globalstar.com/en/index.php?cid=7010&pressId=633; Globalstar, Inc., Globalstar Announces Launch Schedule For New Satellites (press release), Feb. 9, 2011, http://www.globalstar.com/en/index.php?cid=7010&pressId=650.

<sup>&</sup>lt;sup>3</sup> All of Globalstar's requests for STA filed on Dec. 12, 2010 were granted, extending the STA for these antennas until Feb. 16 or 22, 2011, except that the STA request for CLFN-1 (File No. SES-STA-20101212-01533; Call Sign: E970199) remains pending. The STA for this antenna expired on Dec. 17, 2010.

<sup>&</sup>lt;sup>4</sup> Globalstar requests that its pending STA request for CLFN-1 be granted and that the instant extension request extend the term of that antenna's STA for an additional 60 days.

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Respectfully submitted,

/s/ Samir Jain

Samir Jain Counsel to GUSA Licensee LLC

Encl.