

April 12, 2011

Samir C. Jain

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

+1 202 663 6083(t)  
+1 202 663 6363(f)  
samir.jain@wilmerhale.com

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 antennas to communicate with its launched second-generation satellites for purposes of telemetry and control pending grant of the necessary authorizations and registration of its satellites by the government of France, as required by the Commission’s recent *Order*.<sup>2</sup> Globalstar requests expedited treatment of this extension request because its existing STA for these earth stations expires between April 17 and April 23, 2011, and Globalstar requires the continued ability to communicate with its satellites from these antennas.<sup>3</sup>

---

<sup>1</sup> As permitted under 47 C.F.R. § 25.120. The previously granted STA requests were: SES-STA-20110225-00214 (SBRG-1); SES-STA-20110225-00215 (SBRG-2); SES-STA-20110225-00216 (SBRG-3); SES-STA-20110225-00217 (SBRG-4); SES-STA-20110225-00207 (CLFN-1); SES-STA-20110225-00208 (CLFN-2); SES-STA-20110225-00209 (CLFN-3); SES-STA-20110225-00210 (CLFN-4); SES-STA-20110225-00213 (CLFN-5); SES-STA-20110225-00211 (CLFN-IOT). Technical exhibits for these antennas are attached to the instant request.

<sup>2</sup> See Order, *Globalstar Licensee LLC, Application for Modification of Non-geostationary Mobile Satellite Service Space Station License, GUSA Licensee LLC, Applications For Modification Of Mobile Satellite, Service Earth Station Licenses*, 26 FCC Rcd 3948, 3962 ¶ 35 (IB, rel. Mar. 18, 2011) (“Order”).

<sup>3</sup> Details about individual STA terms are contained in the attached technical exhibits.

Ms. Mindel De La Torre  
April 12, 2011  
Page 2

As described in the *Order*, Globalstar has embarked on a transition to its second-generation satellite constellation.<sup>4</sup> 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>

The Commission conditioned the grant of Globalstar's application, which includes the authority for its antennas to communicate with the second-generation satellites, upon Globalstar's receipt of certain French authorizations and international registration of Globalstar's satellites by the government of France.<sup>6</sup> Globalstar is in the midst of the authorization process in France, which it hopes to complete as expeditiously as possible. However, that process will not be complete by the time Globalstar's current STA expires. In the meantime, Globalstar must be able to continue effective control and monitoring of its launched satellites and, accordingly, requests authority to do so.

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>4</sup> *Id.* at 3590-591 ¶ 5.

<sup>5</sup> *See generally* Globalstar, *Press Releases*, <http://www.globalstar.com/en/index.php?cid=7010>.

<sup>6</sup> *See Order*, 26 FCC Rcd at 3962 ¶ 35 (“The authority to operate granted in connection with these earth station applications shall become effective upon grant by France of an authorization for space operations under the June 3, 2008 French law n° 2008-518 relating to space operations, and only for communications with space stations for which France grants authority and undertakes to register under the United Nations Registration Convention.”)

Ms. Mindel De La Torre  
April 12, 2011  
Page 3

Respectfully submitted,

*/s/ Samir Jain*

Samir Jain  
*Counsel to GUSA Licensee LLC*

Encl.