

July 28, 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 (E050097);  
SES-MFS-20091221-01616 (E050098); SES-MFS-20091221-01617  
(E050099); SES-MFS-20091221-01618 (E050100); SES-AFS-20091221-  
01607 (E970199); SES-MFS-20091221-01608 (E000342); SES-MFS-  
20091221-01609 (E000343); SES-MFS-20091221-01610 (E000344);  
SES-MFS-20091221-01611 (E000345); SES-MFS-20091221-01601  
(E030266)

ITU Designation: HIBLEO-X

Dear Ms. De La Torre:

GUSA Licensee LLC (“Globalstar”) hereby requests Special Temporary Authority<sup>1</sup> (“STA”) for 33 days (until August 29, 2011) to allow ten of its Commission-licensed antennas to communicate with its recently 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 March 2011 *Order*.<sup>2</sup> Globalstar requests expedited treatment of this request.

As described in the *Order*, Globalstar has embarked on a transition to its second-generation satellite constellation.<sup>3</sup> This transition involves the launch of 24 new satellites, with

---

<sup>1</sup> See 47 C.F.R. § 25.120. 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> *Order*, 26 FCC Rcd at 3590-591 ¶ 5.

Ms. Mindel De La Torre  
July 28, 2011  
Page 2

the first batch of six satellites launched on October 19, 2010, and the second batch of six satellites launched on July 13, 2011 from Baikonur, Kazakhstan.<sup>4</sup>

Globalstar requested, and received, STA on June 30, 2011 to communicate with its second-generation satellites launched on October 19, 2010, but, although Globalstar's request encompassed all of its second-generation satellites, that grant does not appear to authorize communication with its satellites launched on July 13, 2011.<sup>5</sup> Accordingly, Globalstar is submitting the instant STA request to ensure that it has authority to communicate with all of its launched second-generation satellites from its Commission-licensed earth stations. Globalstar's request for a 33-day STA until August 29, 2011 is intended to temporally align the STA term for communication with its satellites launched on October 19, 2010 and those launched on July 13, 2011.

The Commission conditioned the grant of Globalstar's application in the *Order*, which includes the authority for its antennas to communicate with all of its 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 has submitted all relevant materials in connection with its application to the French authorities, and the French Centre National d'Études Spatiales (CNES) has recommended approval of the application. Globalstar understands that no further action is required on its part and is simply awaiting a decision, which it hopes to receive as expeditiously as possible. In the meantime, Globalstar must be able to continue effective control and monitoring of its launched satellites and, accordingly, requests authority to do so.

---

<sup>4</sup> See Press Release, *Globalstar Announces Successful Second Launch Of Six New Satellites* (July 14, 2011), <http://www.globalstar.com/en/index.php?cid=7010&pressId=681>.

<sup>5</sup> See SES-STA-20110629-00753 (E970199); SES-STA-20110629-00754 (E000342); SES-STA-20110629-00755 (E000343); SES-STA-20110629-00756 (E000344); SES-STA-20110629-00757 (E000345); SES-STA-20110629-00758 (E030266); SES-STA-20110629-00759 (E050097); SES-STA-20110629-00760 (E050098); SES-STA-20110629-00760 (E050098); SES-STA-20110629-00761 (E050099); SES-STA-20110629-00762 (E050100) (all granted on June 30, 2011 and expiring on Aug. 29, 2011).

<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  
July 28, 2011  
Page 3

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.

Respectfully submitted,

*/s/ Samir Jain*

Samir Jain  
*Counsel to GUSA Licensee LLC*

Encl.