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Via Electronic Filing

Tom Sullivan
Chief, International Bureau
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

**Re: Request for Special Temporary Authority – 60 Days (Clifton, TX)
GUSA Licensee LLC**

Dear Mr. Sullivan:

GUSA Licensee LLC (together with its parent Globalstar, Inc., “Globalstar”) hereby requests a 60-day Special Temporary Authority (“STA”) under Section 25.120(a) of the Commission’s rules in order to operate an additional gateway earth station antenna at Clifton, Texas, primarily for testing purposes.¹ Globalstar will soon submit an application for permanent authority for this gateway antenna, which from a hardware and RF perspective is identical to Globalstar’s existing, licensed gateway earth station antennas in Clifton.

Grant of the requested STA will provide significant benefits for Globalstar’s mobile satellite service (“MSS”) network. While this additional gateway earth station antenna may support some commercial traffic, Globalstar intends to use this gateway antenna primarily for the development and testing of new products and technologies, as well as for validating repaired equipment and software upgrades. With an antenna dedicated to testing and validation, Globalstar can carry out such activity without affecting existing operational systems at its commercial gateways. This testing capacity is critical. Before Globalstar can roll out new services and applications and incorporate repaired equipment and upgraded software into its gateways and other commercial systems, thorough testing must be performed at the subsystem level, at the system level using loopback simulators, and finally over the air.

As indicated above, this additional gateway earth station antenna is identical to Globalstar’s existing, licensed gateway earth station antennas in Clifton (call signs E970199, E000342, E000343, and E000344) from a hardware and RF perspective. The proposed antenna has the same manufacturer and is the same model number (ALCATEL 9775) as Globalstar’s other Clifton earth station antennas. Accordingly, this gateway earth station antenna will have exactly the same operational configuration and technical parameters as Globalstar’s other Clifton

¹ 47 C.F.R. § 25.120(a).

gateway antennas. Globalstar's additional gateway antenna will comply with all applicable Commission regulations. Globalstar provides the relevant technical parameters for this antenna at Exhibit 2 to this STA request.

In addition to supporting all the carriers that are currently supported by Globalstar's existing Clifton gateway facilities, Globalstar plans to utilize this additional gateway to test and validate two new waveforms for use over its MSS network.² Globalstar hopes to use these waveforms to improve and enhance its safety-of-life MSS offerings.

Globalstar includes the relevant technical parameters for these waveforms in Exhibit 2. As described in Exhibit 2, the two proposed waveforms are burst mode packet data carriers that will support short-messaging data services. For one of these waveforms, the channel bandwidth will be 200 kHz at 5096-5250 MHz and 20 kHz at 6900-7055 MHz, while the bandwidth for the second waveform will be 2 MHz at 5096-5250 MHz and 200 kHz at 6900-7055 MHz. In addition, as Technical Exhibit 2 indicates, while the total EIRP for these test transmissions will be the same as for Globalstar's existing licensed services, the EIRP density for these waveforms will exceed the EIRP density values for Globalstar's current feeder link operations. These test transmissions will nonetheless create no greater potential for interference than Globalstar's existing operations at 5091-5250 MHz/6875-7055 MHz.

Globalstar respectfully requests expedited treatment of this STA request. An expeditious grant of this STA by April 10, 2020, will allow Globalstar to maximize its testing capabilities generally, and in particular to assess these new waveforms and develop enhanced safety-of-life services as rapidly as possible. As indicated above, Globalstar will within the near future apply for permanent authority for this gateway antenna.

Please do not hesitate to contact me with any questions.

Respectfully submitted,

/s/ Stephen J. Berman
Stephen J. Berman

cc: Paul Blais

² Globalstar has concurrently filed four additional STA requests so that it can also utilize its existing, licensed Clifton earth station antennas in this test program.