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May 8, 2020

*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 (Las Palmas, PR)  
GCL Licensee LLC – Call Sign E990337**

Dear Mr. Sullivan:

Pursuant to Section 25.120(a) of the Commission's rules, GCL Licensee LLC (together with its parent Globalstar, Inc., "Globalstar") hereby requests a 60-day Special Temporary Authority ("STA"), beginning June 30, 2020, in order to commence operation of one of Globalstar's new, second-generation feeder link earth station antennas in Las Palmas, PR, under call sign E990337.<sup>1</sup> During June 2020, Globalstar will decommission the first-generation earth station antenna currently operating in Las Palmas under call sign E990337 and replace that antenna with its second-generation feeder link model. Once installed and authorized, this antenna will become fully operational at the Las Palmas gateway and carry an appropriate share of Globalstar's commercial mobile satellite service ("MSS") traffic. Within the near future, Globalstar will seek permanent authority for this second-generation earth station antenna by applying for modification of its operations under call sign E990337.

Grant of the requested STA will provide significant operational benefits for Globalstar's MSS network. Globalstar's second-generation feeder link earth station antennas are 6-meter dishes with radomes, manufactured by Seatel. These antennas will be more efficient than Globalstar's existing transceivers, requiring less power and only minimal maintenance. These second-generation facilities will also provide superior satellite-tracking capability, relying on state-of-the-art auto-track technology. Given these benefits, Globalstar plans to deploy these second-generation feeder link antennas at all of its U.S. gateway locations over the next one to two years. Notably, these antennas will be similar to Globalstar's current gateway systems from an RF perspective, and will comply with all applicable Commission regulations. Globalstar provides the relevant technical parameters for its second-generation earth station antenna in the Technical Exhibit ("Exhibit 2") to this STA request.

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<sup>1</sup> 47 C.F.R. § 25.120(a).

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

Globalstar will transmit these waveforms on a test basis over its second-generation earth station antenna in Las Palmas because this approach represents the best means of testing, validating, and finalizing the parameters for these carriers.<sup>2</sup> By using its operational feeder link facilities, Globalstar can ensure that these waveforms will meet the specific requirements of its safety-of-life service offerings. Globalstar's Las Palmas gateway will transmit this test waveform traffic concurrently with its existing commercial traffic at 5091-5250 MHz/6875-7055 MHz. Globalstar will avoid any interference to its current MSS operations through appropriate frequency separation in these bands.

Globalstar provides the relevant technical parameters for its proposed transmissions of these new waveforms in Exhibit 2. As described in this exhibit, 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 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

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<sup>2</sup> GCL Licensee LLC has concurrently filed three additional STA requests so that it can utilize its other licensed Las Palmas earth station antennas in this test program. In addition, GCL Licensee's affiliate GUSA Licensee LLC (also wholly owned by Globalstar, Inc.) has concurrently filed four STA requests so that Globalstar can use its four licensed earth station antennas in Sebring, FL, for this testing. Globalstar is currently conducting test operations with the new waveforms at its licensed gateway earth facilities in Clifton, TX, under STAs granted to GUSA Licensee LLC in April. See Application for Special Temporary Authority of GUSA Licensee LLC, IBFS File No. SES-STA-20200330-00348 (filed Mar. 30, 2020); *Satellite Communications Services Information re: Actions Taken*, Public Notice, Report No. SES-02258 at 51 (Apr. 15, 2020); Application for Special Temporary Authority of GUSA Licensee LLC, IBFS File No. SES-STA-20200330-00349 (filed Mar. 30, 2020); *Satellite Communications Services Information re: Actions Taken*, Public Notice, Report No. SES-02258 at 51 (Apr. 15, 2020); Application for Special Temporary Authority of GUSA Licensee LLC, IBFS File No. SES-STA-20200330-00350 (filed Mar. 30, 2020); *Satellite Communications Services Information re: Actions Taken*, Public Notice, Report No. SES-02258 at 51 (Apr. 15, 2020); Application for Special Temporary Authority of GUSA Licensee LLC, IBFS File No. SES-STA-20200330-00351 (filed Mar. 30, 2020); *Satellite Communications Services Information re: Actions Taken*, Public Notice, Report No. SES-02258 at 52 (Apr. 15, 2020); Application for Special Temporary Authority of GUSA Licensee LLC, IBFS File No. SES-STA-20200330-00352 (filed Mar. 30, 2020); *Satellite Communications Services Information re: Actions Taken*, Public Notice, Report No. SES-02258 at 52 (Apr. 15, 2020).

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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 asks that the Commission grant the requested STA effective June 30, 2020. Grant of this 60-day STA effective June 30 will allow Globalstar to activate its second-generation earth station antenna on a timely basis, and will enable it to utilize the new waveforms and develop enhanced safety-of-life services as rapidly as possible. As indicated above, Globalstar will soon seek permanent authority for its second-generation antenna in Las Palmas by applying for modification of its operations under call sign E990337.

Please do not hesitate to contact me with any questions.

Respectfully submitted,

/s/ Stephen J. Berman

Stephen J. Berman

cc: Paul Blais