

## LAWLER, METZGER, KEENEY &amp; LOGAN, LLC

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May 14, 2020

*Via Electronic Filing*

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

**Re: Request for 60-Day Extension of STA (Clifton, TX)  
GUSA Licensee LLC, FCC File No. SES-STA-20200330-00348**

Dear Mr. Sullivan:

Under Section 25.120(a) of the Commission's rules, GUSA Licensee LLC (together with its parent Globalstar, Inc., "Globalstar") hereby requests a 60-day extension of its existing, above-captioned Special Temporary Authority ("STA"), so that it can continue to operate an additional gateway earth station antenna at Clifton, Texas, primarily for testing purposes.<sup>1</sup> On April 27, 2020, Globalstar applied 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.<sup>2</sup> Extension of the current STA will enable Globalstar to operate this antenna while its application for permanent authority is pending.

The requested extension 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 is using and will continue 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 is able to 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

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<sup>1</sup> 47 C.F.R. § 25.120(a). The Commission granted Globalstar's current STA for operation of this earth station antenna on April 9, 2020. *See* FCC File No. SES-STA-20200330-00348; *Satellite Communications Services Information re: Actions Taken*, Public Notice, Report No. SES-02258 at 51 (Apr. 15, 2020)

<sup>2</sup> *See* FCC File No. SES-LIC-20200427-00449.

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 has exactly the same operational configuration and technical parameters as Globalstar's other Clifton gateway antennas. Globalstar's additional gateway antenna complies 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 under its existing STA is authorized to use this additional gateway 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.

Over the past month, Globalstar has transmitted these waveforms on a test basis over this gateway antenna – as well as over its other licensed gateway antennas in Clifton – because this approach represents the best means of testing, validating, and finalizing the parameters for these carriers.<sup>3</sup> While this test activity has so far been productive and yielded essential information regarding the performance of these waveforms, Globalstar will need to conduct additional testing and validation through another 60-day STA period to ensure that these carriers will meet the specific requirements of its safety-of-life service 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 support short-messaging data services. For one of these waveforms, the channel bandwidth is 200 kHz at 5096-5250 MHz and 20 kHz at 6900-7055 MHz, while the bandwidth for the second waveform is 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 is the same as for Globalstar's existing licensed services, the EIRP density for these waveforms exceeds the EIRP density values for Globalstar's current feeder link operations. These test transmissions nonetheless create no greater potential for interference than Globalstar's existing operations at 5091-5250 MHz/6875-7055 MHz. Finally, while Globalstar's Clifton gateways are transmitting this test waveform traffic concurrently with its existing, licensed commercial feeder link traffic,

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<sup>3</sup> GUSA Licensee LLC has concurrently filed four additional STA extension requests so that Globalstar can continue to utilize its other authorized Clifton earth station antennas in this test program. In addition, GUSA Licensee LLC and its affiliate GCL Licensee LLC recently filed additional STA requests so that Globalstar can also utilize its licensed earth station antennas in Sebring, FL, and Las Palmas, PR, for this testing.

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Globalstar will continue to avoid any interference to its current MSS operations through appropriate frequency separation in these bands.

Grant of this extension request by the June 9, 2020 expiration date for Globalstar's current STA will allow it to operate this earth station antenna while its application for permanent authority is pending. This extension will enable Globalstar to maximize its testing capabilities in Clifton and, in particular, to assess the new waveforms and develop enhanced safety-of-life services as rapidly as possible.

Please do not hesitate to contact me with any questions.

Respectfully submitted,

/s/ Stephen J. Berman

Stephen J. Berman

cc: Paul Blais