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August 4, 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-20200417-00421

Dear Mr. Sullivan:

Under Section 25.120 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 one of Globalstar's new, second-generation feeder link earth station antennas in Clifton, TX, under call sign E202040.¹ In addition, pursuant to this 60-day STA extension request, Globalstar now seeks authority to test and validate two new waveforms under call sign E202040 during the proposed 60-day STA period. Globalstar plans to use these new waveforms to improve and enhance its future safety-of-life mobile satellite service ("MSS") offerings.

Grant of the requested STA extension will provide significant operational benefits for Globalstar's MSS network. Globalstar's second-generation feeder link earth station antennas – 6-meter Seatel dishes with radomes – are more efficient than Globalstar's existing transceivers, requiring less power and only minimal maintenance. These second-generation facilities 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.

¹ 47 C.F.R. § 25.120. The Commission granted Globalstar's current STA for operation of this earth station antenna on June 30, 2020. *See* FCC File No. SES-STA-20200417-00421; *Satellite Communications Services Information re: Actions Taken*, Public Notice, Report No. SES-02281 at 274 (July 1, 2020).

On June 10, 2020, Globalstar applied for authority to operate this second-generation feeder link earth station antenna under call sign E202040 on a permanent basis. *See* Application of GUSA Licensee LLC, FCC File No. SES-LIC-20200610-00614 (filed June 10, 2020). Extension of the current STA will enable Globalstar to operate this second-generation antenna while its application for permanent authority is pending.

Notably, these antennas are similar to Globalstar's current gateway systems from an RF perspective and 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.

Under call sign E202040 and the above-captioned STA, this second-generation earth station antenna currently supports all the carriers that are today supported by Globalstar's other gateway facilities in Clifton. As indicated above, Globalstar now also requests authority to use this second-generation antenna to test and validate two new waveforms for use over its MSS network during the proposed 60-day STA period. Such test transmissions represent the best means of assessing, validating, and finalizing the parameters for these new waveforms and ensuring that its carriers will meet the specific requirements of its safety-of-life service offerings.²

Globalstar provides the relevant technical parameters for its transmissions of these waveforms in the Technical Exhibit to this application ("Exhibit 2"). As described in Exhibit 2, the new 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 4.5 MHz at 5096-5250 MHz and 200 kHz at 6900-7055 MHz.

As Exhibit 2 indicates, while the total EIRP for these modified 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. In addition, while Globalstar's Clifton gateways are transmitting this revised test waveform traffic concurrently with its existing, licensed commercial feeder link traffic, Globalstar will continue to avoid any interference to its current MSS operations through appropriate frequency separation in these bands.

Grant of this STA extension request by the current STA's August 29, 2020 expiration date will allow Globalstar to continue to operate its second-generation earth station antenna under call sign E202040, and will enable it to test the new waveforms and develop enhanced safety-of-life services as rapidly as possible. Once the testing and validation process has been completed for the new waveforms, Globalstar will apply for authority to utilize these new waveforms under call sign E202040 on a permanent basis.

² Globalstar through its subsidiaries has concurrently filed additional STA extension requests so that it can continue to utilize its other authorized Clifton earth station antennas in this test program, as well as its licensed earth station antennas in Sebring, FL, and Las Palmas, PR.

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Please do not hesitate to contact me with any questions.

Respectfully submitted,

/s/ Stephen J. Berman
Stephen J. Berman

cc: Paul Blais