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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 (Las Palmas, PR)**
GCL Licensee LLC – FCC File No. SES-STA-20200508-00514

Dear Mr. Sullivan:

Under Section 25.120(a) of the Commission’s rules, GCL 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 under call sign E990337, in Las Palmas, PR.¹ Grant of this STA extension will also enable Globalstar to continue to test and validate two new waveforms under this call sign. Globalstar plans to utilize these new waveforms to improve and enhance its safety-of-life mobile satellite services (“MSS”).

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

¹ 47 C.F.R. § 25.120(a). On June 30, 2020, the Commission granted a 60-day STA for operation of Globalstar’s second-generation earth station antenna in Las Palmas under call sign E990337. *See* Application of GCL Licensee LLC, FCC File No. SES-STA-20200508-00514 (May 8, 2020) (“May 8 STA Application”); *Satellite Communications Services Information re: Actions Taken*, Public Notice, Report No. SES-02281 at 276 (July 1, 2020).

On July 28, 2020, GCL Licensee LLC requested authority to modify this feeder link earth station antenna, to enable Globalstar to operate its second-generation earth station antenna under call sign E990337 on a permanent basis. *See* Application for Modification of GCL Licensee LLC, FCC File No. SES-MOD-INTR2020-02008 (July 28, 2020). Extension of the current STA will enable Globalstar to utilize this antenna while its modification application is pending.

feeder link antennas at all of its U.S. gateway locations over the next one to two years. 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.

In addition to supporting all the carriers that are today supported by Globalstar's existing Las Palmas gateway facilities, this second-generation feeder link antenna is currently being used by Globalstar to evaluate two new waveforms for use over its MSS network. Under its current STA, Globalstar has transmitted these waveforms on a test basis over this feeder link gateway antenna – as well as over its other licensed gateway antennas in Las Palmas – because this approach represents the best means of assessing, validating, and finalizing the parameters for these carriers.² While this test activity has been productive and yielded essential information regarding the performance of the waveforms, Globalstar will need to conduct additional testing and validation through another 60-day STA period to ensure that its carriers will meet the specific requirements of its safety-of-life service offerings.

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 (and as Globalstar has previously described), the new waveforms are burst mode packet data carriers that will support short-messaging data services. In its testing to date, the channel bandwidth for one of these waveforms has been 200 kHz at 5096-5250 MHz and 200 kHz at 6900-7055 MHz, while the bandwidth for the second waveform has been 2 MHz at 5096-5250 MHz and 200 kHz at 6900-7055 MHz.³ Globalstar now plans to modify this second waveform so that it has an uplink bandwidth of 4.5 MHz at 5096-5250 MHz (the downlink bandwidth for this waveform would remain 200 kHz at 6900-7055 MHz). This wider uplink bandwidth should improve service quality by providing greater protection against narrowband interference.⁴

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

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

³ Globalstar provided the relevant technical waveform parameters for its testing to date in the Technical Exhibit to its May 8 STA Application. *See* May 8 STA Application at Exhibit 2: Earth Station Technical Information for STA Request.

⁴ As indicated in its other concurrently filed extension requests, Globalstar pursuant to this test program also seeks to transmit the revised 4.5 MHz-bandwidth waveform from its other authorized earth station antennas in Las Palmas, as well as from its licensed earth stations in Clifton and Sebring.

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exceeds the EIRP density values for Globalstar's current feeder link operations.⁵ 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 Las Palmas 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 E990337, and will enable it to continue testing 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 to modify call sign E990337 to permit use of these waveforms on a permanent basis.

Please do not hesitate to contact me with any questions.

Respectfully submitted,

/s/ Stephen J. Berman
Stephen J. Berman

cc: Paul Blais

⁵ The revised test waveform with a 4.5 MHz uplink bandwidth has a lower EIRP density than the current test waveform with a 2 MHz uplink bandwidth.