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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-20200508-00512

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 test and validate two waveforms using Globalstar’s licensed feeder link earth station antenna operating under call sign E990335, in Las Palmas, PR.¹ Globalstar plans to utilize these new waveforms to improve and enhance its safety-of-life mobile satellite services (“MSS”).

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 Sebring – because this approach represents the best means of evaluating, 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.

¹ 47 C.F.R. § 25.120(a). The Commission granted Globalstar’s current STA for testing of the new waveforms under call sign E990335 on June 30, 2020. *See* FCC File No. SES-STA-20200508-00512; *Satellite Communications Services Information re: Actions Taken*, Public Notice, Report No. SES-02281 at 275 (July 1, 2020).

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.

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 20 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 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 Sebring 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 extension request by the August 29, 2020 expiration date for Globalstar’s current STA will support continued testing and allow it to utilize the new waveforms and develop enhanced safety-of-life services as rapidly as possible. Once the testing and validation process has been completed, Globalstar will apply to modify call sign E990335 to permit use of these waveforms on a permanent basis.

³ Globalstar provided the relevant technical waveform parameters for its testing to date in the Technical Exhibit to its May 8, 2020 STA request. *See* Application of GCL Licensee LLC, Exhibit 2: Earth Station Technical Information for STA Request, FCC File No. SES-STA-20200508-00512 (May 8, 2020).

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.

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.

Mr. Tom Sullivan
August 4, 2020
Page 3

Please do not hesitate to contact me with any questions.

Respectfully submitted,

/s/ Stephen J. Berman
Stephen J. Berman

cc: Paul Blais