

LAWLER, METZGER, KEENEY & LOGAN, LLC

1717 K STREET, NW
SUITE 1075
WASHINGTON, D.C. 20006

STEPHEN J. BERMAN

PHONE (202) 777-7700
FACSIMILE (202) 777-7763

August 11, 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-20200508-00511**

Dear Mr. Sullivan:

On August 4, 2020, GCL Licensee LLC (together with its parent Globalstar, Inc., “Globalstar”) requested 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 E990336, in Las Palmas, PR.¹ In its August 4 STA Request, Globalstar indicated that it planned in September to decommission the first-generation earth station antenna currently operating in Las Palmas under call sign E990336 and replace that antenna with its second-generation feeder link model, and, accordingly, Globalstar sought authority to commence operating that second-generation earth station antenna under call sign E990336 during the proposed 60-day STA period. Since that filing, Globalstar has decided to postpone the decommissioning of its first-generation antenna under E990336 until after the proposed STA period. Given that it will continue to operate this first-generation antenna until sometime in 2021, Globalstar now amends its August 4 STA Request by providing the relevant technical parameters for its continued operation of this antenna, including its proposed transmission of the two new waveforms.

Under the current STA for call sign E990336, Globalstar has transmitted the new waveforms on a test basis over its existing feeder link gateway antenna – as well as over its other licensed gateway antennas in Las Palmas – because this approach represents the best means of

¹ 47 C.F.R. § 25.120(a). *See* Application of GCL Licensee LLC, FCC File No. SES-STA-20200804-00826 (Aug. 4, 2020) (“August 4 STA Request”). The Commission granted Globalstar’s current STA for testing of the new waveforms under call sign E990336 on June 30, 2020. *See* FCC File No. SES-STA-20200508-00511; *Satellite Communications Services Information re: Actions Taken*, Public Notice, Report No. SES-02281 at 275 (July 1, 2020).

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. Globalstar plans to utilize these new waveforms to improve and enhance its safety-of-life mobile satellite services (“MSS”).

Globalstar provides the relevant technical parameters for its transmissions of these waveforms over its existing feeder link antenna 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 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.

² Globalstar through its subsidiaries has 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, 2020 STA request for E990336. *See* Application of GCL Licensee LLC, Exhibit 2: Earth Station Technical Information for STA Request, FCC File No. SES-STA-20200508-00511 (May 8, 2020).

⁴ As indicated in other extension requests also filed on August 4, 2020, Globalstar pursuant to this test program 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.

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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 E990336 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