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April 13, 2021

Via Electronic Filing

Tom Sullivan
Chief, International Bureau
Federal Communications Commission
45 L Street NE
Washington, DC 20554

**Re: Request for 60-Day Special Temporary Authority (Las Palmas, PR)
GCL Licensee LLC – Call Sign E990336**

Dear Mr. Sullivan:

GCL Licensee LLC (together with its parent Globalstar, Inc., “Globalstar”) hereby requests a 60-day Special Temporary Authority (“STA”) under Section 25.120(a) of the Commission’s rules in order to operate one of Globalstar’s second-generation feeder link earth station antennas under call sign E990336 in Las Palmas, Puerto Rico.¹ Grant of this STA will also enable Globalstar to test and validate a new waveform under this call sign. Globalstar plans to utilize this new waveform to improve and enhance its safety-of-life mobile satellite services (“MSS”).

Grant of the requested STA at the Las Palmas gateway facility will provide significant operational benefits for Globalstar’s MSS network and its subscribers. Globalstar’s second-generation feeder link earth station antennas – 6-meter Cobham SATCOM 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. Notably, these antennas are similar to Globalstar’s current gateway systems from an RF perspective and comply with all applicable

¹ 47 C.F.R. § 25.120(a). On February 17, 2021, Globalstar applied for authority to modify its feeder link earth station authority under call sign E990336 so that it can operate a second-generation feeder link earth station antenna in Las Palmas, Puerto Rico on a permanent basis. See Application of GCL Licensee LLC, IBFS File No. SES-MOD-20210217-00352 (Feb. 17, 2021) (“February Application”).

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.²

In addition to supporting all the carriers that are today supported by Globalstar’s licensed MSS network, Globalstar’s second-generation feeder link antenna will be used under the requested STA to evaluate a new waveform for use on its network. Globalstar plans to transmit this waveform on a test basis over this antenna because this approach represents the best means of assessing, validating, and finalizing the parameters for this carrier. Such testing is necessary to ensure that this carrier will meet the specific requirements of Globalstar’s safety-of-life service offerings.³

Globalstar provides the relevant technical parameters for its transmission of this new waveform in the Technical Exhibit to this application (“Exhibit 2”). As described in Exhibit 2 (and as Globalstar has previously described), this waveform is a burst mode packet data carrier that supports short-messaging data services. For this waveform, the maximum channel bandwidth is 4.5 megahertz at 5096-5250 MHz and 200 kilohertz at 6900-7055 MHz.⁴

Grant of the requested 60-day STA by May 1, 2021 will allow Globalstar to operate the proposed earth station antenna in Las Palmas while the February Application for permanent authority remains pending. Such temporary authority will advance the public interest by enabling Globalstar to test its new waveform and develop enhanced safety-of-life services as rapidly as possible.

² As indicated in the February Application and in Exhibit 2 to the instant STA request, authorization of Globalstar’s second-generation earth station antenna will result in an increase in total EIRP for operations under call sign E990336. Specifically, total EIRP following a grant of the requested STA will increase from 68.0 dBW to 72.2 dBW under this license.

³ Globalstar’s Las Palmas gateway antennas will transmit this revised test waveform traffic concurrently with its existing, licensed commercial feeder link traffic. Globalstar will avoid any interference to its current MSS operations through appropriate frequency separation in these bands.

⁴ As indicated in the February Application, the transmit emission designator for the new waveform at 5096-5250 MHz under the proposed STA for call sign E990336 is 4M50G7D, while the proposed receive emission designators for the new waveform at 6900-7055 MHz are 200KG7D, 230KG7D, and 280KG7D.

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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
Anthony Asongwed