

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

June 4, 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 (Naalehu, HI)
GUSA Licensee LLC – SES-LIC-20201211-01365 (Call Sign E202198)**

Dear Mr. Sullivan:

GUSA 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 at its new gateway facility in Naalehu, Hawaii.¹ Globalstar requests a grant of this STA request by July 1, 2021, so that it can expeditiously begin testing this second-generation antenna and accelerate the use of its mobile satellite service (“MSS”) network for enhanced safety-of-life services.

On December 11, 2020, Globalstar applied for authority to operate a second-generation feeder link earth station antenna in Naalehu, Hawaii on a permanent basis.² The Commission placed the December Application on public notice in March 2021, and no party opposed or commented on this application.³ Globalstar continues to urge the Commission to grant the December Application as soon as possible, given the strong public interest benefits of such approval. In the meantime, grant of the requested 60-day STA by July 1, 2021 will allow Globalstar to operate the proposed second-generation earth station antenna in Hawaii while the December Application for permanent authority remains pending.

¹ 47 C.F.R. § 25.120(a).

² See Application of GUSA Licensee LLC, FCC File No. SES-LIC-20201211-01365 (Dec. 11, 2020)] (“December Application”). Globalstar concurrently applied for permanent authority to operate two additional earth station antennas in Naalehu. See Application of GUSA Licensee LLC, FCC File No. SES-LIC-20201211-01366 (Dec. 11, 2020); Application of GUSA Licensee LLC, FCC File No. SES-LIC-20201211-01364 (Dec. 11, 2020).

³ *Satellite Communications Services re: Satellite Radio Applications Accepted for Filing*, Public Notice, Report No. SES-02341 at 7-8 (rel. Mar. 3, 2021).

Clearly, grant of the requested STA at the new Hawaii gateway facility will yield significant benefits for Globalstar's MSS network and its subscribers. As explained in Globalstar's December Application, the initiation of feeder link operations at the new Hawaii gateway will promote innovation for Globalstar's safety-of-life service and other offerings, increase its service availability and quality in the United States, and significantly expand its MSS signal coverage by creating an extensive new coverage area over Hawaii and surrounding waters.⁴ In addition, activation of this second-generation earth station antennas will improve Globalstar's satellite control and help optimize its constellation management. These second-generation earth station antennas – 6-meter Cobham SATCOM dishes with radomes – provide superior satellite-tracking capability, relying on state-of-the-art auto-track technology. These antennas are also more efficient than Globalstar's existing transceivers, requiring less power and only minimal maintenance.

Given the benefits of its second-generation feeder link antenna technology, Globalstar plans to deploy these antennas at all of its U.S. gateway locations over the next six months. 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 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 its safety-of-life service offerings.

Globalstar provides the relevant technical parameters for its transmissions 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. The maximum channel bandwidth for this waveform is 4.5 megahertz at 5096-5250 MHz and 200 kilohertz at 6900-7055 MHz.

As indicated above, grant of the requested 60-day STA by July 1, 2021 will enable Globalstar to operate the proposed earth station antenna in Hawaii while the December Application for permanent authority remains pending. Such temporary authority will advance the public interest by enabling Globalstar to significantly expand its MSS coverage, test its new waveform, and expedite the roll-out of its enhanced safety-of-life services.

⁴ December Application, Public Interest Statement at 1, 4-5.

Mr. Tom Sullivan
June 4, 2021
Page 3

Please do not hesitate to contact me with any questions.

Respectfully submitted,

/s/ Stephen J. Berman
Stephen J. Berman

cc: Kerry Murray
Paul Blais
Anthony Asongwed