

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

July 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 Extension of STA (Reno, NV)
 GUSA Licensee LLC – FCC File No. SES-STA-20210506-00777 (Call Sign
 E202182)**

Dear Mr. Sullivan:

Under Section 25.120 of the Commission’s rules, GUSA 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 at its new gateway facility in Reno, Nevada, under call sign E202182.¹ Grant of this STA extension will help accelerate Globalstar’s use of its mobile satellite service (“MSS”) network for enhanced safety-of-life services while its application for permanent authority for this antenna remains pending.²

¹ 47 C.F.R. § 25.120.

² On October 26, 2020, Globalstar applied for authority to operate the instant second-generation feeder link earth station antenna in Reno, Nevada on a permanent basis. *See* Application of GUSA Licensee LLC, FCC File No. SES-LIC-20201026-01179 (Oct. 26, 2020) (“October Application”). On December 16, 2020, Globalstar amended the October Application, requesting permanent authority for two additional receive emission designators. *See* Application for Amendment of GUSA Licensee LLC, FCC File No. SES-AMD-20201216-01393 (Dec. 16, 2020). The Commission placed the amended October Application on public notice in January 2021, and no party opposed or commented on this application. *See Satellite Communications Services re: Satellite Radio Applications Accepted For Filing*, Public Notice, Report No. SES-02334 at 2-4, 14-16 (Jan. 13, 2021). Out of an abundance of caution, Globalstar submitted a request for a 60-day STA on May 6, 2021, so that it could operate the instant antenna while the amended October Application remained pending. *See* FCC File No. SES-STA-20210506-00777. The Commission granted Globalstar’s current STA for operation of this earth station antenna on May 27, 2021. *See Satellite Communications Services Information re: Actions Taken*, Public Notice, Report No. SES-02370 at 12-13 (June 2, 2021). Given that the October Application is still pending, Globalstar must now submit the instant STA

Clearly, grant of the requested STA extension will yield significant benefits for Globalstar's MSS network and its subscribers. As explained in Globalstar's October Application, feeder link operations at the new Nevada gateway expand Globalstar's MSS signal coverage, improve its service quality in the western United States, and promote innovation for its safety-of-life service and other offerings.³ In addition, operation of this second-generation earth station antenna improves Globalstar's satellite control and helps 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 to twelve months.⁴ 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 operating under call sign E202182 is currently being used by Globalstar to evaluate a new waveform for use on its network. Globalstar will need to conduct additional testing and validation through another 60-day STA period 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 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. The maximum channel bandwidth for this waveform is 4.5 megahertz at 5096-5250 MHz and 200 kilohertz at 6900-7055 MHz.

Globalstar urges the Commission to expeditiously grant the instant request for a 60-day extension of the STA for call sign E202182. Such grant will enable Globalstar to continue to operate the proposed earth station antenna in Nevada while the October Application for permanent authority remains pending. Furthermore, this continued temporary authority will advance the public interest by enabling Globalstar to enhance its MSS coverage

extension in order to maintain its feeder link operations under call sign E202182 beyond the July 26, 2021 STA expiration date.

³ October Application, Public Interest Statement at 1.

⁴ The Commission recently granted licenses for the operation of three of Globalstar's second-generation earth station antennas in Naalehu, Hawaii. *See Satellite Communications Services Information re: Actions Taken*, Public Notice, Report No. SES-02380 at 2-8 (July 7, 2021).

Mr. Tom Sullivan

July 13, 2021

Page 3

in the western United States, test its new waveform, and develop enhanced safety-of-life services as rapidly as possible.

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