

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

December 3, 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 (Clifton, TX)**
GUSA Licensee LLC – FCC File No. SES-STA-20210722-01266 (Call Sign
E970199)

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 under call sign E970199, in Clifton, Texas.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 license modification application for this antenna remains pending.²

¹ 47 C.F.R. § 25.120.

² On December 15, 2020, Globalstar applied for authority to modify its feeder link earth station antenna under call sign E970199 in Clifton, Texas, so that it can operate its second-generation earth station antenna under this call sign on a permanent basis. *See* Application of GUSA Licensee LLC, FCC File No. SES-MOD-20201215-01383 (Dec. 15, 2020) ("December 2020 Application"). The Commission placed the December 2020 Application on public notice in January 2021. *See Satellite Communications Services re: Satellite Radio Applications Accepted For Filing*, Public Notice, Report No. SES-02334 at 43-45 (Jan. 13, 2021). The Commission granted Globalstar's current STA for this earth station antenna on October 15, 2021. *See* Application for Special Temporary Authority of GUSA Licensee LLC, FCC File No. SES-STA-20210722-01266 (July 22, 2021); *Satellite Communications Services Information re: Actions Taken*, Public Notice, Report No. SES-02410 at 29-30 (Oct. 20, 2021). Given that the December 2020 Application is still pending, Globalstar now submits the instant STA extension in order to continue to operate this second-generation antenna under call sign E970199 beyond the existing December 14, 2021 STA expiration date.

Grant of the requested STA extension will yield significant benefits for Globalstar's MSS network and its subscribers. As explained in Globalstar's December 2020 Application, 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.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 provide superior satellite-tracking capability, relying on state-of-the-art auto-track technology.

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.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 E970199 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 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 E970199. Such grant will enable Globalstar to continue to operate the second-generation earth station antenna in Texas while the December 2020 Application for modification remains pending, and will advance the public interest by enabling Globalstar to and develop enhanced safety-of-life services as rapidly as possible.

³ December 2020 Application, Cover Letter at 1.

⁴ The Commission in July 2020 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
December 3, 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