

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 6, 2022

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-20220803-00837 (Call Sign
E000343)

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 second-generation feeder link earth station antennas under call sign E000343 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

Grant of the requested STA extension will yield significant 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. In addition, operation of this second-generation earth station antenna improves Globalstar's satellite control and helps optimize its constellation management. These second-generation

¹ 47 C.F.R. § 25.120(a).

² On June 23, 2022, Globalstar applied for authority to modify its feeder link earth station antenna under call sign E000343 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-20220623-00688 (June 23, 2022) ("June Application"). The Commission granted Globalstar's current STA for this earth station antenna on November 3, 2022. See *Satellite Communications Services Information re: Actions Taken*, Public Notice, Report No. SES-02516 at 5-6 (Nov. 9, 2022). Given that the June Application is still pending, Globalstar now submits the instant STA extension in order to continue to operate this second-generation antenna under call sign E000343 beyond the existing December 21, 2022 STA expiration date.

facilities also 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. 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.

Globalstar urges the Commission to expeditiously grant the instant request for a 60-day extension of the STA for call sign E000343. Such grant will enable Globalstar to operate the second-generation earth station antenna in Clifton while the June Application remains pending, and will advance the public interest by allowing Globalstar to realize significant operational benefits 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
Anthony Asongwed