

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

March 28, 2023

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 (Clifton, TX)
GUSA Licensee LLC – IBFS File No. SES-LIC-20230323-00407**

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 rules¹ in order to operate an additional second-generation feeder link earth station antenna in Clifton, Texas, primarily for testing purposes. Grant of the requested STA at the Clifton gateway facility will provide significant operational benefits for Globalstar’s mobile satellite service (“MSS”) network and its subscribers.

On March 23, 2023, Globalstar submitted the above-captioned application for authority to operate this second-generation gateway earth station antenna in Clifton on a permanent basis.² Globalstar urges the Commission to grant the March Application as soon as possible, given the strong public interest benefits resulting from such approval. In the meantime, grant of the requested 60-day STA by May 1, 2023 will allow Globalstar to operate the proposed second-generation antenna in Clifton while the March Application remains pending.³

¹ 47 C.F.R. § 25.120(a).

² GUSA Licensee, LLC, Application for New Earth Station Authorization, IBFS File No. SES-LIC-20230323-00407 (Mar. 23, 2023) (“March Application”).

³ Globalstar is concurrently requesting an STA for another second-generation feeder link earth station antenna at its Clifton gateway site that will also be operated primarily for testing purposes. Globalstar applied for permanent authority to operate this earth station antenna in Clifton on March 23, 2023. GUSA Licensee, LLC, Application for New Earth Station Authorization, IBFS File No. SES-LIC-20230323-00406 (Mar. 23, 2023).

As indicated above, grant of this requested STA will yield significant public interest benefits. As an initial matter, Globalstar's second-generation earth station antennas provide substantial operational value for its MSS network. Globalstar's second-generation earth station antennas are 6-meter dishes with radomes, manufactured by Cobham SATCOM. These antennas are more efficient than Globalstar's first-generation 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.

Notably, the proposed gateway earth station antenna, in conjunction with an additional second-generation antenna being concurrently proposed (*see* note 3 *supra*), will provide a comprehensive gateway test bed capability in Clifton for testing typical gateway operation with multiple LEO satellites. Two second-generation test antennas are necessary for this Globalstar test bed. There are usually two or three Globalstar satellites simultaneously in view of a gateway, and the deployment of two second-generation test antennas will enable the simultaneous testing of two satellites and their respective hand-off capabilities, a crucial feature of Globalstar's Big LEO MSS system.⁴

These second-generation test antennas will be utilized for the development of new products and technologies, as well as for validating repaired equipment and software upgrades. With antennas dedicated to testing and validation, such activity can be carried out without affecting existing operational systems at Globalstar's commercial gateways. This testing capacity is critical. Before new services and applications can be rolled out and repaired equipment and upgraded software incorporated into Globalstar's gateways and other commercial systems, thorough testing must be performed at the subsystem level, at the system level using loopback simulators, and finally over the air. Grant of the instant application will facilitate this required testing.

Globalstar's proposed second-generation antenna complies with all applicable Commission regulations. Globalstar provides the relevant technical parameters for this antenna in the Technical Exhibit ("Exhibit 2") to this STA request.

Grant of the requested 60-day STA by May 1, 2023 will allow Globalstar to operate the proposed earth station antenna in Clifton while the March Application is pending. This

⁴ Globalstar in 2021 was granted permanent authority to operate one first-generation earth station antenna in Clifton primarily for testing purposes, but it now requires the operation of two additional second-generation antennas to meet the key goals of its Clifton test bed facility. *Satellite Communications Services Information re: Actions Taken*, Public Notice, Report No. SES-02400 at 4-5 (Sept. 15, 2021).

Mr. Tom Sullivan

March 28, 2023

Page 3

temporary authority will produce substantial benefits for Globalstar's MSS network and further the public interest. Please do not hesitate to contact me with any questions.

Respectfully submitted,

/s/ Stephen J. Berman

Stephen J. Berman

cc: Kerry Murray
Franco Hinojosa
Anthony Asongwed