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November 22, 2019

Via Electronic Filing

Tom Sullivan
Chief, International Bureau
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: **Request for Special Temporary Authority – 60 Days (Clifton, TX)
GUSA Licensee LLC**

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 of the Commission’s rules in order to test and validate a prototype of Globalstar’s new, second-generation gateway earth station antenna in Clifton, TX.¹ Globalstar plans to deploy second-generation earth station antennas at its U.S. gateway locations over the next one to two years. During the requested 60-day STA period, Globalstar will validate the prototype antenna’s satellite tracking capability, its telemetric commands to Globalstar’s satellites, and its ability to carry operational traffic over Globalstar’s mobile satellite service (“MSS”) network.

Globalstar’s second-generation earth station antennas are 6-meter dishes with radomes, manufactured by Seatel. These antennas will yield significant operational benefits for Globalstar’s MSS network. They will be more efficient than Globalstar’s existing transceivers, requiring less power and only minimal maintenance. These second-generation facilities will also provide superior satellite-tracking capability, relying on state-of-the-art auto-track technology. These antennas will be similar to Globalstar’s current gateway systems from an RF perspective, and will comply with all applicable Commission regulations. Globalstar provides the relevant technical parameters of its prototype second-generation antenna at Exhibit 1 to this application.

The testing and validation process for Globalstar’s prototype second-generation gateway antenna will consist of three basic phases. In the first phase, Globalstar will test the antenna’s ability to receive communications from its MSS constellation and track its satellites. The antenna will not transmit to the satellites during this period. In the second phase, Globalstar’s prototype antenna will send telemetric commands to its MSS satellites. These telemetry

¹ 47 C.F.R. § 25.120.

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transmissions will have no effect on Globalstar's communications traffic. In the final phase, the prototype antenna will support Globalstar's MSS operations by transmitting actual communications traffic during scheduled test periods. Globalstar will verify the antenna's performance as it carries commercial communications traffic from its customers.

This testing and validation process should take approximately thirty to sixty days. Once validated, this prototype second-generation antenna will become fully operational at the Clifton gateway facility and carry an appropriate share of Globalstar's MSS traffic. Globalstar expects to decommission one of its existing, first-generation antennas in Clifton during the first half of 2020. Within the near future, Globalstar will submit an application for permanent authority for this new earth station antenna.

Globalstar respectfully requests expedited treatment of this STA request. The prototype antenna has been delivered to Globalstar's Clifton facility, and Globalstar hopes to initiate the testing and validation process as soon as possible.

Please do not hesitate to contact me with any questions.

Respectfully submitted,

/s/ Stephen J. Berman
Stephen J. Berman

cc: Paul Blais