

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

February 4, 2020

Via Electronic Filing

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

**Re: Request for Sixty-Day Extension of Special Temporary Authority (Clifton, TX) (IBFS File No. SES-STA-20191122-01542)
GUSA Licensee LLC**

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 sixty-day extension of its existing Special Temporary Authority ("STA") in Clifton, Texas, in order to test and validate a prototype of Globalstar's new, second-generation gateway earth station antenna at its Clifton facility.¹

The Commission granted Globalstar its current sixty-day STA on December 17, 2019.² Unfortunately, due to unforeseen software issues, Globalstar was unable to initiate the testing and validation of this prototype antenna as planned in late December 2019. To ensure that transmissions from this prototype antenna would raise no technical concerns for Globalstar's mobile satellite service ("MSS") network, Globalstar postponed the testing and validation process until these software issues were fully resolved. Globalstar now expects to begin this process during the first half of February 2020 and to conclude this activity during March 2020. Accordingly, Globalstar respectfully seeks this sixty-day STA extension to permit completion of this required testing and validation.

As Globalstar described in its November STA Request, it plans to deploy second-generation earth station antennas at its U.S. gateway locations over the next one to two years. Globalstar's second-generation earth station antennas are 6-meter dishes with radomes,

¹ 47 C.F.R. § 25.120; Application for Special Temporary Authority of GUSA Licensee LLC, IBFS File No. SES-STA-20191122-01542 (filed Nov. 22, 2019); *Satellite Communications Services Information re: Actions Taken*, Public Notice, Report No. SES-02227 at 63 (Dec. 18, 2019) ("December STA Grant").

² December STA Grant.

manufactured by Seatel. These antennas will yield significant operational benefits for Globalstar's mobile satellite service ("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. With this extension request, Globalstar again 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 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.

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

Please do not hesitate to contact me with any questions.

Respectfully submitted,

/s/ Stephen J. Berman
Stephen J. Berman

cc: Paul Blais