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March 30, 2020

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 – Call Sign E970199**

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 rules in order to test and validate two waveforms using Globalstar’s licensed gateway earth station antenna operating under call sign E970199, in Clifton, TX.¹ Globalstar plans to utilize these new waveforms to improve and enhance its safety-of-life mobile satellite services (“MSS”).

Globalstar will transmit these waveforms on a test basis over this gateway antenna – as well as over its other licensed gateway antennas in Clifton – because this approach represents the best means of testing, validating, and finalizing the parameters for these carriers.² By using its operational feeder link facilities, Globalstar can ensure that these waveforms will meet the specific requirements of its safety-of-life service offerings. Globalstar’s Clifton gateways will transmit this test waveform traffic concurrently with its existing, licensed commercial feeder link traffic at 5091-5250 MHz/6875-7055 MHz. Globalstar will avoid any interference to its current MSS operations through appropriate frequency separation in these bands.

Globalstar provides the relevant technical parameters for its proposed transmissions of these waveforms in the Technical Exhibit to this application (“Exhibit 1”). As described in Exhibit 1, the two proposed waveforms are burst mode packet data carriers that will support short-messaging data services. For one of these waveforms, the channel bandwidth will be 200

¹ 47 C.F.R. § 25.120(a).

² Globalstar has concurrently filed three additional STA requests so that it can utilize its other licensed Clifton earth station antennas in this test program. Globalstar has also filed another STA request to permit the operation of an additional gateway earth station antenna in Clifton, including test operations using the new waveforms.

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kHz at 5096-5250 MHz and 20 kHz at 6900-7055 MHz, while the bandwidth for the second waveform will be 2 MHz at 5096-5250 MHz and 200 kHz at 6900-7055 MHz. In addition, as Exhibit 1 indicates, while the total EIRP for these test transmissions will be the same as for Globalstar's existing licensed services, the EIRP density for these waveforms will exceed the EIRP density values for Globalstar's current feeder link operations. These test transmissions will nonetheless create no greater potential for interference than Globalstar's existing operations at 5091-5250 MHz/6875-7055 MHz.

Globalstar respectfully requests expedited treatment of this STA request. An expeditious grant of this STA by April 10, 2020, will allow Globalstar to utilize these waveforms and develop enhanced safety-of-life services as rapidly as possible. Once the testing and validation process has been completed, Globalstar will apply to modify call sign E970199 and its other gateway earth station authorizations in Clifton to permit use of these waveforms on a permanent basis.

Please do not hesitate to contact me with any questions.

Respectfully submitted,

/s/ Stephen J. Berman
Stephen J. Berman

cc: Paul Blais