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April 17, 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 Nos. SES-STA-20191122-01542, SES-STA-20200204-00122) GUSA Licensee LLC**

Dear Mr. Sullivan:

Under Section 25.120 of the Commission's rules,¹ 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.

The Commission granted Globalstar a sixty-day STA on December 17, 2019, and subsequently issued a sixty-day extension of that STA on February 24, 2020.² Unfortunately, due to unforeseen but continuing software issues and operational delays caused by the Covid-19 pandemic, Globalstar has been unable to initiate the testing and validation of this prototype antenna as originally planned. To ensure that transmissions from this prototype antenna will raise no technical concerns for Globalstar's mobile satellite service ("MSS") network, Globalstar postponed this process until full resolution of these software issues. Following recent, remotely-conducted troubleshooting activity, Globalstar can now begin the testing and validation process during the second half of April 2020. It expects to conclude this activity during May 2020. Accordingly, Globalstar respectfully seeks this sixty-day STA extension to permit completion of this required testing and validation.

¹ 47 C.F.R. § 25.120.

² 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); Application for Special Temporary Authority of GUSA Licensee LLC, IBFS File No. SES-STA-20200204-00122 (filed Feb. 4, 2020); *Satellite Communications Services Information re: Actions Taken*, Public Notice, Report No. SES-02245 at 63 (Feb. 26, 2020).

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As Globalstar has previously described, 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, 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. 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. Globalstar will shortly submit an application for permanent authority for this new earth station antenna.

Please do not hesitate to contact me with any questions.

Respectfully submitted,

/s/ Stephen J. Berman

Stephen J. Berman

cc: Paul Blais