

## LAWLER, METZGER, KEENEY &amp; LOGAN, LLC

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May 8, 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 (Sebring, FL)  
GUSA Licensee LLC – Call Sign E050098**

Dear Mr. Sullivan:

Pursuant to Section 25.120(a) of the Commission's rules, GUSA Licensee LLC (together with its parent Globalstar, Inc., "Globalstar") hereby requests a 60-day Special Temporary Authority ("STA"), beginning June 30, 2020, in order to test and validate two waveforms using Globalstar's licensed gateway earth station antenna operating under call sign E050098, in Sebring, FL.<sup>1</sup> 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 in Las Palmas because this approach represents the best means of testing, validating, and finalizing the parameters for these carriers.<sup>2</sup> By using its operational feeder link facilities, Globalstar can

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<sup>1</sup> 47 C.F.R. § 25.120(a).

<sup>2</sup> GUSA Licensee LLC has concurrently filed three additional STA requests so that it can utilize its other licensed Sebring earth station antennas in this test program. In addition, GUSA Licensee's affiliate GCL Licensee LLC (also wholly owned by Globalstar, Inc.) has concurrently filed four STA requests so that Globalstar can use its four licensed earth station antennas in Las Palmas, PR, for this testing. Globalstar is currently conducting test operations with the new waveforms at its licensed gateway earth facilities in Clifton, TX, under STAs granted to GUSA Licensee LLC in April. See Application for Special Temporary Authority of GUSA Licensee LLC, IBFS File No. SES-STA-20200330-00348 (filed Mar. 30, 2020); *Satellite Communications Services Information re: Actions Taken*, Public Notice, Report No. SES-02258 at 51 (Apr. 15, 2020); Application for Special Temporary Authority of GUSA Licensee LLC, IBFS File No. SES-STA-20200330-00349 (filed Mar. 30, 2020); *Satellite Communications Services Information re: Actions Taken*, Public Notice, Report No. SES-02258 at 51 (Apr. 15, 2020); Application for Special Temporary Authority of GUSA Licensee LLC, IBFS File No. SES-STA-20200330-00350 (filed Mar. 30, 2020); *Satellite Communications Services Information re:*

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ensure that these waveforms will meet the specific requirements of its safety-of-life service offerings. Globalstar's Sebring gateway 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 2"). As described in this exhibit, 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 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 2 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 asks that the Commission grant the requested STA effective June 30, 2020. Grant of this 60-day STA effective June 30 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 E050098 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

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*Actions Taken*, Public Notice, Report No. SES-02258 at 51 (Apr. 15, 2020); Application for Special Temporary Authority of GUSA Licensee LLC, IBFS File No. SES-STA-20200330-00351 (filed Mar. 30, 2020); *Satellite Communications Services Information re: Actions Taken*, Public Notice, Report No. SES-02258 at 52 (Apr. 15, 2020); Application for Special Temporary Authority of GUSA Licensee LLC, IBFS File No. SES-STA-20200330-00352 (filed Mar. 30, 2020); *Satellite Communications Services Information re: Actions Taken*, Public Notice, Report No. SES-02258 at 52 (Apr. 15, 2020).