

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

May 14, 2020

Via Electronic Filing

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

Re: **Request for 60-Day Extension of STA (Clifton, TX)**
GUSA Licensee LLC – FCC File No. SES-STA-20200330-00352

Dear Mr. Sullivan:

Under Section 25.120(a) of the Commission’s rules, GUSA Licensee LLC (together with its parent Globalstar, Inc., “Globalstar”) hereby requests a 60-day extension of its existing, above-captioned Special Temporary Authority (“STA”), so that it can continue to test and validate two waveforms using Globalstar’s licensed gateway earth station antenna operating under call sign E000343, in Clifton, TX.¹ Globalstar plans to utilize these new waveforms to improve and enhance its safety-of-life mobile satellite services (“MSS”).

Under its existing STA, Globalstar has over the past month transmitted 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 While this test activity has so far been productive and yielded essential information regarding the performance of these waveforms, Globalstar will need to conduct additional testing and validation through another 60-day STA period to ensure that these carriers will meet the specific requirements of its safety-of-life service offerings.

¹ 47 C.F.R. § 25.120(a). The Commission granted Globalstar’s current STA for testing of the new waveforms under call sign E000343 on April 9, 2020. *See* FCC File No. SES-STA-20200330-00352; *Satellite Communications Services Information re: Actions Taken*, Public Notice, Report No. SES-02258 at 52 (Apr. 15, 2020).

² GUSA Licensee LLC has concurrently filed four additional STA extension requests so that Globalstar can continue to utilize its other authorized Clifton earth station antennas in this test program. In addition, GUSA Licensee LLC and its affiliate GCL Licensee LLC recently filed additional STA requests so that Globalstar can also utilize its licensed earth station antennas in Sebring, FL, and Las Palmas, PR, for this testing.

Mr. Tom Sullivan

May 14, 2020

Page 2

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 Exhibit 2, 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 is 200 kHz at 5096-5250 MHz and 20 kHz at 6900-7055 MHz, while the bandwidth for the second waveform is 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 is the same as for Globalstar’s existing licensed services, the EIRP density for these waveforms exceeds the EIRP density values for Globalstar’s current feeder link operations. These test transmissions nonetheless create no greater potential for interference than Globalstar’s existing operations at 5091-5250 MHz/6875-7055 MHz. Finally, while Globalstar’s Clifton gateways are transmitting this test waveform traffic concurrently with its existing, licensed commercial feeder link traffic, Globalstar will continue to avoid any interference to its current MSS operations through appropriate frequency separation in these bands.

Grant of this extension request by the June 9, 2020 expiration date for Globalstar’s current STA will support continued testing and allow it 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 E000343 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