

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

October 27, 2020

Via Electronic Filing

Tom Sullivan
Chief, International Bureau
Federal Communications Commission
45 L Street NE
Washington, DC 20554

Re: **Request for 60-Day Extension of STA (Clifton, TX)**
GUSA Licensee LLC – FCC File No. SES-STA-20200804-00822

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 feeder link earth station antenna operating under call sign E970199, in Clifton, TX.¹ Globalstar hopes to use these new waveforms to improve and enhance its future safety-of-life mobile satellite service ("MSS") offerings. In addition, pursuant to this 60-day STA extension request, Globalstar now seeks authority to commence operating one of its new second-generation feeder link earth station antennas under call sign E970199 during the 60-day STA period. Grant of this requested STA extension will provide significant operational benefits for Globalstar's MSS network.

During November 2020, Globalstar plans to decommission the first-generation earth station antenna currently operating in Clifton under call sign E970199 and replace that antenna with its second-generation feeder link model, a 6-meter Seatel dish with a radome. Notably, Globalstar's second-generation antennas 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.² Once authorized and installed (likely during the 60-day STA period rather

¹ 47 C.F.R. § 25.120(a). The Commission granted Globalstar's current STA for testing of the new waveforms under call sign E970199 on September 9, 2020. *See* FCC File No. SES-STA-20200804-00822; *Satellite Communications Services Information re: Actions Taken*, Public Notice, Report No. SES-02301 at 72 (Sep. 16, 2020).

² Given the operational benefits associated with its second-generation feeder link antennas, Globalstar plans to deploy these antennas at all of its U.S. gateway locations over the next one to two years.

than at the outset), Globalstar's new antenna under call sign E970199 will become fully operational at the Clifton gateway and carry an appropriate share of Globalstar's commercial MSS traffic.

Globalstar's second-generation feeder link earth station antennas will be similar to its current gateway systems from an RF perspective and will comply with all applicable Commission regulations. Globalstar provides the relevant technical parameters for its second-generation earth station antenna in the Technical Exhibit ("Exhibit 2") to this STA request.

In addition to supporting all the carriers that are currently supported by Globalstar's existing Clifton gateway facilities, Globalstar plans to utilize its second-generation feeder link antenna under call sign E970199 to continue to evaluate its two new waveforms for use over its MSS network. Under its current STA, Globalstar has transmitted these waveforms on a test basis over this feeder link gateway antenna – as well as over its other licensed gateway antennas in Clifton – because this approach represents the best means of assessing, validating, and finalizing the parameters for these carriers.³ While this test activity has been productive and yielded essential information regarding the performance of the waveforms, Globalstar will need to conduct additional testing and validation through another 60-day STA period to ensure that its carriers will meet the specific requirements of its safety-of-life service offerings.

Globalstar provides the relevant technical parameters for its proposed transmission of these waveforms using its second-generation antenna in Exhibit 2. As described there (and as Globalstar has previously described), the new waveforms are burst mode packet data carriers that 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 4.5 MHz at 5096-5250 MHz and 200 kHz at 6900-7055 MHz.

As Exhibit 2 indicates, while the total EIRP for these modified 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. In addition, while Globalstar's Clifton gateways are transmitting this revised 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 STA extension request by the current STA's November 8, 2020 expiration date will enable Globalstar to begin operating its second-generation earth station antenna under call sign E970199 during the new 60-day STA period, and will allow it to continue testing the

³ Globalstar through its subsidiaries is filing additional STA extension requests so that it can continue to utilize its other authorized Clifton earth station antennas in this test program, as well as its licensed earth station antennas in Sebring, FL, and Las Palmas, PR.

Mr. Tom Sullivan

October 27, 2020

Page 3

new waveforms and develop enhanced safety-of-life services as rapidly as possible. Within the near future, Globalstar will seek permanent authority for this second-generation earth station antenna by applying for modification of its operations under call sign E970199.⁴

Please do not hesitate to contact me with any questions.

Respectfully submitted,

/s/ Stephen J. Berman

Stephen J. Berman

cc: Paul Blais

⁴ Once the testing and validation process has been completed for the new waveforms, Globalstar will also seek to modify call sign E970199 to permit use of these waveforms on a permanent basis.