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December 9, 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 (Las Palmas, PR)**
GCL Licensee LLC – FCC File No. SES-STA-20200804-00824

Dear Mr. Sullivan:

Under Section 25.120(a) of the Commission's rules, GCL 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 operate one of Globalstar's new, second-generation feeder link earth station antennas under call sign E990337, in Las Palmas, PR.¹ Grant of this STA extension will also enable Globalstar to continue to test and validate two new waveforms under this call sign. Globalstar plans to utilize these waveforms to improve and enhance its safety-of-life mobile satellite service ("MSS") offerings.

¹ 47 C.F.R. § 25.120(a). On October 27, 2020, the Commission granted a 60-day STA for operation of Globalstar's second-generation earth station antenna in Las Palmas under call sign E990337. *See* Application of GCL Licensee LLC, FCC File No. SES-STA-20200804-00824 (Aug. 4, 2020) ("August STA Application"); *Satellite Communications Services Information re: Actions Taken*, Public Notice, Report No. SES-02314 at 22 (Oct. 28, 2020).

On July 28, 2020, GCL Licensee LLC requested authority to modify this feeder link earth station antenna, to enable Globalstar to operate its second-generation earth station antenna under call sign E990337 on a permanent basis. *See* Application for Modification of GCL Licensee LLC, FCC File No. SES-MOD-20200728-00812 (July 28, 2020) ("July Application"); *Satellite Communications Services re: Satellite Radio Applications Accepted for Filing*, Public Notice, Report No. SES-02312 at 13-14 (Oct. 21, 2020). On October 30, 2020, Globalstar amended the July Application, seeking permanent authority to transmit one of its two new waveforms on a permanent basis. *See* Application for Amendment of GCL Licensee LLC, FCC File No. SES-AMD-20201030-01202 (Oct. 30, 2020). Extension of the current STA will enable Globalstar to utilize this antenna while its amended modification application is pending.

Grant of the requested STA extension will provide significant operational benefits for Globalstar's MSS network. Globalstar's second-generation feeder link earth station antennas – 6-meter Cobham SATCOM dishes with radomes – are more efficient than Globalstar's existing transceivers, requiring less power and only minimal maintenance. These second-generation facilities also provide superior satellite-tracking capability, relying on state-of-the-art auto-track technology. Given these benefits, Globalstar plans to deploy these second-generation feeder link antennas at all of its U.S. gateway locations over the next one to two years. Notably, these antennas are similar to Globalstar's current gateway systems from an RF perspective and 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 today supported by Globalstar's existing Las Palmas gateway facilities, this second-generation feeder link antenna operating under call sign E990337 is currently being used by Globalstar to evaluate 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 Las Palmas – because this approach represents the best means of assessing, validating, and finalizing the parameters for these carriers.² 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 transmissions of these waveforms in the Technical Exhibit to this application ("Exhibit 2"). As described in Exhibit 2 (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 kilohertz at 5096-5250 MHz and 20 kilohertz at 6900-7055 MHz, while the bandwidth for the second waveform is 4.5 megahertz at 5096-5250 MHz and 200 kilohertz 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 Las Palmas 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.

² Globalstar through its subsidiaries is filing additional STA extension requests so that it can continue to utilize its other authorized Las Palmas earth station antennas in this test program, as well as its licensed earth station antennas in Clifton, TX, and Sebring, FL.

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Globalstar urges the Commission to expeditiously grant the instant STA extension request by the current STA's December 25, 2020 expiration date. Such grant will allow Globalstar to continue to operate its second-generation earth station antenna under call sign E990337, and will enable it to continue testing the new waveforms and develop enhanced safety-of-life services as rapidly as possible.

Please do not hesitate to contact me with any questions.

Respectfully submitted,

/s/ Stephen J. Berman
Stephen J. Berman

cc: Paul Blais