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Via Electronic Filing

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

Re: **Request for 60-Day Special Temporary Authority (Reno, NV)
GUSA Licensee LLC – FCC File Nos. SES-LIC-20201026-01177 and SES-
AMD-20201216-01394 (Call Sign E202180)**

Dear Mr. Sullivan:

GUSA Licensee LLC (together with its parent Globalstar, Inc., “Globalstar”) hereby requests a 60-day Special Temporary Authority (“STA”) under Section 25.120(a) of the Commission’s rules in order to operate one of Globalstar’s second-generation feeder link earth station antennas at its new gateway facility in Reno, NV.¹

Grant of the requested STA at the new Nevada gateway facility will yield significant benefits for Globalstar’s mobile satellite service (“MSS”) network and its subscribers. As explained in Globalstar’s October Application, the initiation of feeder link operations at the new Nevada gateway will expand Globalstar’s MSS signal coverage, improve its service quality in the western United States, and promote innovation for its safety-of-life service and other offerings.² In addition, activation of this second-generation earth station antennas will improve Globalstar’s satellite control and help optimize its constellation management. These second-generation earth station antennas – 6-meter Cobham SATCOM dishes with radomes – provide superior satellite-tracking capability, relying on state-of-the-art auto-track technology. These antennas are also more efficient than Globalstar’s existing transceivers, requiring less power and only minimal maintenance.

¹ 47 C.F.R. § 25.120(a). On October 26, 2020, Globalstar applied for authority to operate a second-generation feeder link earth station antenna in Reno, Nevada on a permanent basis. *See* Application of GUSA Licensee LLC, FCC File No. SES-LIC-20201026-01177 (Oct. 26, 2020) (“October Application”). On December 16, 2020, Globalstar amended the October Application, requesting permanent authority for two additional receive emission designators. *See* Application for Amendment of GCL Licensee LLC, FCC File No. SES-AMD-20201216-01394 (Dec. 16, 2020).

² October Application, Public Interest Statement at 1.

Given the benefits of its second-generation feeder link antenna technology, Globalstar plans to deploy these 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 licensed MSS network, Globalstar's second-generation feeder link antenna will be used under the requested STA to evaluate two new waveforms for use on its network. Globalstar plans to transmit these waveforms on a test basis over this antenna because this approach represents the best means of assessing, validating, and finalizing the parameters for these carriers. Such testing is necessary 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 new waveforms in the Technical Exhibit to this application ("Exhibit 2"). As described in Exhibit 2 (and as Globalstar has previously described), these 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 maximum channel bandwidth for the second waveform is 4.5 megahertz at 5096-5250 MHz and 200 kilohertz at 6900-7055 MHz.

Grant of the requested 60-day STA by February 1, 2021 will allow Globalstar to operate the proposed earth station antenna in Nevada while the October Application for permanent authority remains pending. Such temporary authority will advance the public interest by enabling Globalstar to enhance its MSS coverage in the western United States, test its 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