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July 19, 2002

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: IB Docket No. 01-185 Ex Parte Notice

Dear Ms. Dortch:

On July 18, 2002, Olof Lundberg, Chief Executive Officer of Globalstar, L.P., and Tony Navarra, President of Globalstar, L.P., gave presentations at our office supporting Globalstar, L.P.'s previously-expressed position on issues in the above-referenced docket. Included among the attendees at these presentations were the following members of the Commission Staff: Peter Tenhula, senior legal advisor to Chairman Powell; Paul Kolodzy, Chairman of the Spectrum Task Force; Breck Blalock, Howard Griboff, Linda Haller, Trey Hanbury, and Laura Krebs of the International Bureau; and Mary Woytek of the Wireless Telecommunications Bureau. David Weinreich of Globalstar, L.P., the undersigned and other representatives of Globalstar, L.P., were also in attendance.

As indicated in the enclosed handout, which was distributed at the meeting, Globalstar, L.P., believes that grant of ATC authority to MSS licensees would serve the public interest, and opposes severance of any part of the MSS spectrum for assignment to a separate ATC provider. Mr. Lundberg and Mr. Navarra explained how Globalstar could use the L-/S-Band MSS spectrum to offer ATC in selected urban areas, while maintaining its MSS service throughout the United States. Mr. Lundberg and Mr. Navarra also explained how authority for ATC could enhance future business for the Globalstar system.

Representatives of Globalstar, L.P., also demonstrated telephone calls over the Globalstar satellite telephone system and over an experimental ATC network.

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Pursuant to Section 1.1206(b)(2) of the Commission's Rules, this letter and the enclosure are being filed electronically over the Commission's Electronic Comment Filing System.

Respectfully submitted,


William D. Wallace

Enclosure



Globalstar Ancillary Terrestrial Component

18 July 2002

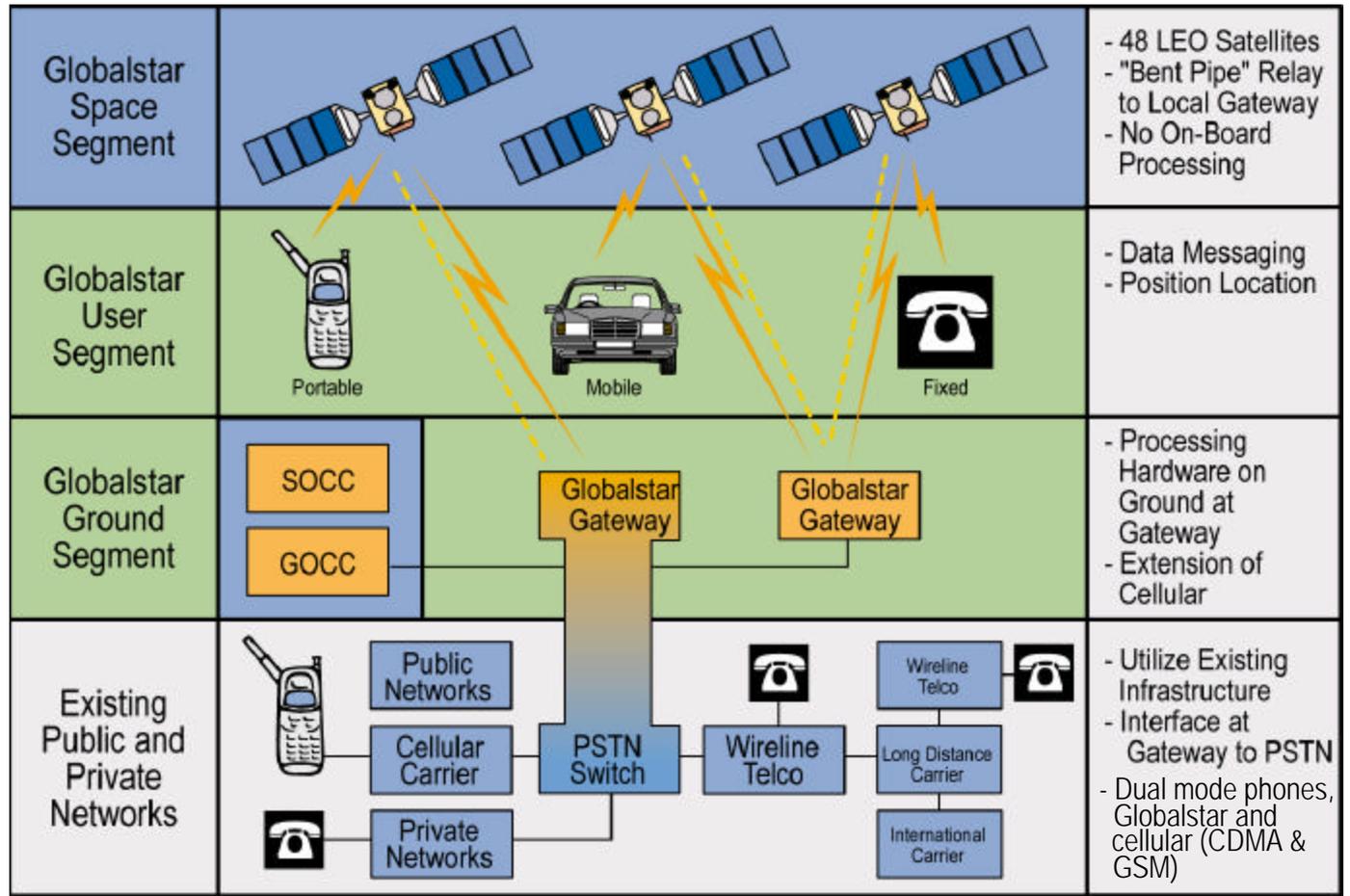
Globalstar



Ancillary Terrestrial Component



Worldwide Satellite Communication Service



Globalstar ■
 Service Providers ■



Globalstar Gateways



Smiths Falls, Canada



High River, Canada



San Martin, Mexico



Bosque Alegre, Argentina



Lurin, Peru



Los Velazques, Venezuela



Beijing, China



Avezzano, Italy



Yeo Ju, Korea



Karkkila, Finland



Delareyville, South Africa



Dubbo, Australia



Khabarovsk, Russia



Clifton, Texas



Novosibirsk, Russia



Moscow, Russia



Riyadh, Saudi Arabia



President Prudente, Brazil



Managua, Nicaragua

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Worldwide Satellite Communication Service



- The applications are plentiful and growing
 - Mining
 - Oil exploration
 - Cargo transport
 - Search and rescue
 - Law enforcement
 - Military

Works in the desert...Across mountains...miles offshore

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Ancillary Terrestrial Component



Usage and System Performance

- 74,535 commercial subscribers as of 30 June 2002
 - 45% increase over 30 June 2001
- 14.5 million minutes year to date through 30 June 2002
 - 54% increase over first half 2001
- Increase in monthly usage, entering high usage time of year
 - June usage, 2002 = 2.9 million minutes; June usage 2001 = 2.0 million minutes
 - 45% increase, June 2002 over June 2001
 - 15% increase, June 2002 over May 2002

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Ancillary Terrestrial Component



Ancillary Terrestrial Component (ATC)

- Buildings and other structures pose a challenge to satellite systems because they can block satellite signals
 - Ancillary Terrestrial Component (ATC) would allow the re-use of Globalstar's own assigned Mobile Satellite Services (MSS) frequencies
 - Frequencies would be used terrestrially
 - Frequencies would be available for indoor and urban areas where satellite service are difficult to provide
 - Globalstar's technology allows for frequency assignment to both satellite and terrestrial through one (existing) control center
 - ATC works like cellular or PCS service
 - Equipment used is very similar to terrestrial cellular and PCS networks



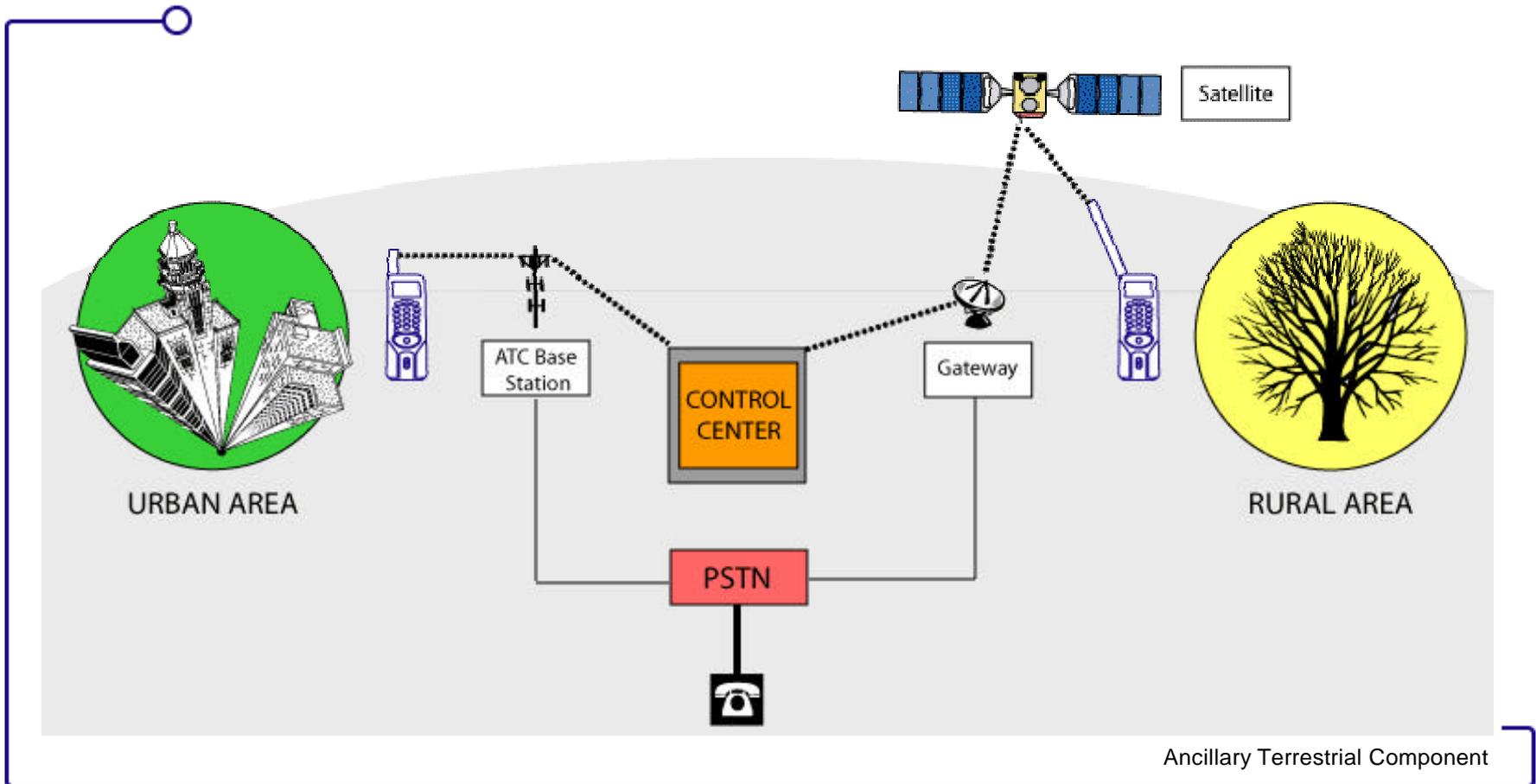
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Worldwide Satellite and ATC Communication Service





One (Existing) Control Center Brings Satellite and ATC Together

- Managed by Globalstar's existing satellite and ground control center with service provided through the use of one, Globalstar user terminal
 - **Satellite** - Existing Globalstar satellite services would continue to operate as it currently does
 - Signals from the handset to the satellite to the Globalstar gateways and into the PSTN
 - **Cellular** - Cellular service to operate as it does today
 - Signals from the handset through the Public Land Mobile Network (PLMN) to the PSTN
 - **Terrestrial** - ATC signals from the handset to the ATC base stations to the PSTN



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Globalstar with ATC is
The ideal solution ... for many wireless customers would be to merge the worldwide reach of Globalstar with the urban coverage of cellular or PCS and deliver service via **one integrated phone.**



**One phone,
One number,
One bill!**

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ATC Authority is in the Public Interest

- ATC significantly improves spectrum utilization
- ATC significantly improves the economics of MSS operation
 - Broadens base of potential subscribers
 - Induces more usage, improving average revenue per unit in service
 - Jump-starts new product development
- ATC provides a reliable, ubiquitous, primary or back-up public safety and emergency response system
- Globalstar desires ATC authority in both its existing L/S Band and in the 2 GHz Band for next generation

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ATC authority cannot be separated from MSS license

- Reduction in L/S Band spectrum for MSS not seriously suggested
- Reduction in L/S Band spectrum would
 - Force costly redesign of system software
 - Require modification of existing Globalstar handsets
 - Reduce system capacity, perhaps ruinously
 - Limit introduction of new MSS services, such as aircraft monitoring
 - Keep cost of service high, subscriber base and income low
 - Decrease financing for replacement/next generation system due to less income

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ATC authority cannot be separated from MSS license

- Reduction in L/S Band spectrum would - (cont'd)
 - Compromise Globalstar's existing ability to avoid interference to/coordinate with Radioastronomy, GPS, GLONASS, ITFS, others
 - CDMA MSS operators require all of the licensed spectrum in order to coordinate with these services
 - Preclude multiple CDMA MSS systems in L/S Band
- Separate MSS/ATC operations are not technically feasible
 - No way to re-use channels in two separate systems
 - No reasonable way to manage interference between ATC and MSS systems
 - No equitable way to assign channels dynamically to different systems
 - Creates host of operational support systems problems for numbering, billing, roaming, etc.

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Single CDMA operator can manage MSS/ATC shared bandwidth

- By allowing MSS operator to integrate ATC and share bandwidth, frequency re-use and capacity is increased by 50% relative to band split between ATC and MSS
 - Improvement is between 55% and 58% by beam count based on following examples
 - MSS operator has to dynamically control frequency assignments in order to achieve this efficiency

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2 GHz MSS vs. Big LEO MSS

- Exactly the same technical considerations apply
 - Dynamic channel assignment
 - Control of interference
 - Efficient utilization of bandwidth
 - Maximizing number of subscribers within licensed bandwidth
 - Better quality of service in metropolitan areas

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Importance of ATC

- Grant of ATC authority to L/S Band MSS would
 - Boost an important, struggling industry
 - Result in exciting new options for consumers
 - Allow MSS to meet emerging public safety and emergency services requirements
 - Maximize public benefit by increasing potential subscribers and reusing existing spectrum

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Summary

- ATC authority is valuable to MSS licensees and to consumers. It should be implemented expeditiously
- It is not technically feasible for a MSS system and a separately-operated ATC to co-exist in a single spectrum band

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