1001 Pennsylvania Avenue, NW, Washington, DC 20004-2595 ▪ p202 624-2500 ▪ f202 628-5116

crowell moring

William D. Wallace
(202) 624-2807
wwallace@crowell.com

January 6, 2003

Ms. 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 January 3, 2003, Phil Marchesiello of Akin Gump Strauss Hauer & Feld, LLP, representing the Official Creditors Committee of Globalstar, L.P., and the undersigned, representing Globalstar, L.P., participated in a meeting with Sam Feder, Legal Advisor to Commissioner Martin, regarding Globalstar, L.P.'s and the Creditors Committee's positions on issues in the above-referenced docket regarding an Ancillary Terrestrial Component ("ATC") for Mobile-Satellite Service ("MSS") systems and also on issues related to a pending petition for rulemaking filed by Iridium Satellite LLC.

Specifically, we expressed the view that the issues raised by Iridium Satellite LLC in its petition are separate from the issues concerning grant of ATC authority to MSS licensees, and that the Commission should consider the merits of and develop a record on that petition in a separate proceeding. Globalstar, L.P., and the Creditors Committee plan to participate fully in such rulemaking.

We also expressed the view that the existing regulatory requirements and coverage standards for MSS systems will ensure that each MSS licensee will launch, operate and maintain a robust satellite system, even after grant of ATC authority. For such a system, there will be economic incentives to promote satellite services actively and to offer satellite services to subscribers in various markets. If an additional "gating requirement" is deemed necessary for MSS-ATC systems, then Globalstar, L.P., and the Creditors Committee support making all end-user ATC handsets capable, either directly or through the combination of components that are designed to be combined, of transmitting and receiving communications via the licensee's satellite platform.

Finally, we noted that a prompt decision on ATC is needed to help ensure the Globalstar system can achieve the maximum benefits from the availability of ATC and to take advantage of potential new investment resulting from the expansion of available MSS services.

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

Respectfully submitted,

William D. Wallace