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

Re: IB Docket No. 02-364

Dear Ms. Dortch:

Globalstar, LLC hereby submits further response regarding three questions recently posed by the FCC to Globalstar and, specifically, replies to that certain ex parte submission of June 2, 2004, submitted by Iridium.

QUESTION 1. Do the RCTA/FAA restrictions apply at 1616 MHz, or at 1613.8 MHz, or somewhere else?

ANSWER 1. Iridium is incorrect in its interpretation of the RTCA documents. Globalstar used the best filter technology available in its aviation products. RTCA\DO-262 clearly has limits on in-band power transmissions and out-of-band transmissions that effect the entire Big LEO band. (Iridium's band is effected as well and the limits are high enough not to effect Iridium's service offerings). RCA\DO-228 lists the minimum GPS filter requirements. These filter requirements drive the out-of-band emission (interference level requirements.)

The aviation industry and the FAA look to the RTCA to produce standards which can be applied in support of avionics certifications. These standards are intended to define requirements whereby electromagnetic compatibility of the equipment with other avionics systems on board the same aircraft can be achieved.

In the case of DO-262, this is a MINIMUM operational performance

standard for avionics supporting Next Generation Satellite Systems (NGSS). Globalstar currently has single and multiple channel products which fall within the scope of this standard and has obtained FAA certification on different aircraft types, including a commercial aircraft.

The standard clearly identifies a requirement for Maximum Total Transceiver Power. Page 22, para 2.2.3.1.2.1.3, Table, which was derived from GPS and GLONASS, provides desensitization specifications assuming 40 dB ant/ant isolation. This requirement is a result of poor out of band rejection specified in the requirements for airborne GPS/GLONASS systems. In order to meet this requirement today, Globalstar is required to operate in the high reverse link channels only. In addition, Globalstar must, and has, implemented detailed methods/requirements for ensuring the isolation between its TX antenna and GNSS antenna is 15 dB greater than the assumed 40dB isolation in the specification if it is to transmit at the necessary power levels in order to provide useful service. The DO-262 Note 1 identifies where the requirements originated from and, in Note 2, there is an example of how compliance could be achieved by demonstrating greater isolation. Achieving greater isolation using separation is very difficult (limited space on an aircraft fuselage.) So Globalstar is further handicapped by being in the position of installing Globalstar products with aircraft that have GPS systems that have been verified to exceed the minimum requirements as defined in GNSS MOPS in order to obtain the additional 15 dB isolation (above 40dB assumed isolation). This requirement has further reduced the target market for Globalstar products. The GLONASS requirement does not allow Globalstar to produce a usable system. Therefore, Globalstar airborne products cannot be used on the same aircraft as GLONASS.

QUESTION 2. Why does Globalstar need 2 channels for aviation communications needs?

ANSWER 2. Globalstar's use of channels above 1616 MHz is necessary for its current service (NOT its "potential service offerings," as Iridium claims). The FCC must continue the Globalstar allocation with at least two channels above 1616 MHz. A FCC reallocation would effectively prohibit Globalstar from continuing to offer services to its current aviation customers, and to a large aviation market. Effectively, it would be handing the market to Iridium. This is clearly not in the public interest, as the Commission's responsibility in this proceeding is to assure efficient use of spectrum, and not to arbitrarily hand to one carrier (Iridium) a portion of a market that Globalstar is currently serving more efficiently.

Globalstar currently has considerable aviation customers today. Globalstar's aviation service has grown extraordinarily in the last year. The growth in aviation subscribers from Q103 to Q104 was 680 percent! The growth in aviation minutes of use from Q103 to Q104 was 1589 percent! Globalstar is currently conducting operational feasibility tests with several commercial and

international airlines. Each one of these represents a large market. By preemptively limiting Globalstar's spectrum, the FCC would be excluding Globalstar from these markets. Also, several United States Government agencies are using Globalstar aviation services now, with the expectation to use more Globalstar aviation services in the future. Any spectrum reallocation would prohibit such uses and the critical national security goals they foster.

Globalstar realizes that this is a United States proceeding. Iridium continues to claim that its Middle East service presents a reason why Iridium requires more spectrum in the United States. To date, Globalstar has not used international arguments because this is a US proceeding. However, if the FCC is going to take international affairs into account in the proceeding, Globalstar offers the following:

1. Globalstar Canada has gone to Industry Canada (IC) to apply for channel 7 (up to 1618.725 MHz) for aviation services. IC told Globalstar Canada that it was awaiting the outcome of the US proceeding.
2. Globalstar's French license starts at 1615 MHz (channels 5-9)
3. Globalstar's Italian license starts at 1616 MHz (channels 6-9)
4. Globalstar's Russian license starts at 1616 MHz (channels 6-9)

The outcome of this proceeding could have large effects on Globalstar services internationally.

QUESTION 3. If GLONASS is moving down in frequency range, as appears to be the case, why does that not open up additional spectrum now not usable due to GLONASS protection needs?

ANSWER 3. Globalstar stands by its statements of June 1, 2004 regarding this matter. Moreover, DO-262 unquestionably has requirements regarding use of facilities on aircraft with GLONASS, which have the effect of prohibiting use of Globalstar facilities, as currently designed. Iridium's abbreviated comments of June 2, 2004 do not even address, much less conflict with, this position. Moreover, their brevity suggests that DO-262 has not even been considered by Iridium.

We trust this to be responsive to the inquiry posed. Please contact the undersigned or William Wallace in the event you have further inquiries.

Very Truly Yours,

Thomas Gutierrez, Esquire

cc: Richard Engelman
James Lynch
James Monroe
Tony Navarra
Richard Roberts
William Adler
William Wallace