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Via Electronic Filing

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

Re: *Streamlining Licensing Procedures for Small Satellites*, IB Docket No. 18-86

Dear Ms. Dortch:

On July 22, 2019, on behalf of Globalstar, Inc. (“Globalstar”), I spoke by telephone with Karl Kensinger and Merissa Velez of the International Bureau regarding the Commission’s recently released draft order on streamlined licensing procedures for small-satellite systems.¹ In particular, we discussed the Commission’s procedures for licensing inter-satellite communications between small satellites and existing, licensed satellite systems such as Globalstar’s Big LEO mobile satellite service (“MSS”) constellation.

Over the past several years, Globalstar’s MSS network has engaged in inter-satellite communications with numerous small-satellite systems – all of which have been “CubeSat” spacecraft – pursuant to experimental licenses granted by the Commission. As the Commission recognized in its Notice of Proposed Rulemaking in this proceeding, these inter-satellite links (“ISLs”) provide important benefits to small-satellite operators.² These operators can maximize operational efficiency by utilizing Globalstar’s existing MSS network to connect to ground facilities, obviating the need to invest in expensive earth station infrastructure or secure dedicated frequencies for Earth-to-space and space-to-Earth links.

In the *NPRM*, the Commission tentatively supported allocation changes that might allow existing satellite licensees as well as small-satellite operators to obtain authority for these ISLs under new streamlined Part 25 procedures, rather than through experimental licensing.³ In the

¹ See *Streamlining Licensing Procedures for Small Satellites*, Report and Order, IB Docket No. 18-86, FCC-CIRC1908-04 (rel. July 11, 2019) (“*Draft Order*”). See also Comments of Globalstar, Inc., IB Docket No. 18-86 (July 9, 2018); Reply Comments of Globalstar, Inc., IB Docket No. 18-86 (Aug. 7, 2018).

² *Streamlining Licensing Procedures for Small Satellites*, Notice of Proposed Rulemaking, 33 FCC Rcd 4152, ¶ 72 (2018) (“*NPRM*”).

³ *NPRM* ¶ 72.

Draft Order, however, the Commission chooses not to pursue allocation changes and instead indicates that it will consider applications for such ISL authority on a case-by-case basis.⁴ As discussed on our call, while it appears that small-satellite operators can seek such authority through the Commission's streamlined licensing procedures for small satellites (proposed Section 25.122), the *Draft Order* does not identify any new process through which existing satellite licensees can gain corresponding authority for their inter-satellite communications with those small-satellite systems. Accordingly, Globalstar urges the Commission in its upcoming order to clarify how existing satellite operators can obtain authority for ISLs to small-satellite systems (on a non-interference basis if non-conforming) – whether through additional streamlined Section 25.122 procedures, current Part 25 special temporary authorization procedures,⁵ or some other licensing mechanism.

Pursuant to section 1.1206(b)(2) of the Commission's rules, 47 C.F.R. § 1.1206(b)(2), this *ex parte* notification is being filed electronically for inclusion in the public record of the above-referenced proceeding.

Respectfully submitted,

/s/ Stephen J. Berman
Stephen J. Berman

cc: Karl Kensinger
Merissa Velez

⁴ *Draft Order* ¶¶ 116-117. The Commission states in the *Draft Order* that it “will continue to treat applications for these or other space-to-space operations as non-conforming with respect to the Table of Allocations where the applicant requests to operate in satellite frequency bands allocated only for operations in the space-to-Earth or Earth-to-space directions, noting that this matter is under additional study at the ITU.” *Id.* ¶ 116. Small-satellite applicants for such non-conforming ISL authority will have to include an appropriate waiver request with their applications, and such ISLs can occur only on a non-interference basis. *Id.*

⁵ 47 C.F.R. § 25.120.