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February 24, 2000

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Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

RE: IB Docket No. 99-81; RM-9328 **EX PARTE PRESENTATION**

Dear Ms. Salas:

On February 23, 2000, John Stern, David Weinreich and William Adler, representing Globalstar, L.P., met with Mark Schneider, senior legal advisor to Commissioner Ness, regarding the above-referenced docket.

This meeting concerned the International Bureau's proposal for licensing 2 GHz Mobile-Satellite Service (MSS) systems (Public Notice, DA 00-222, released Feb. 7, 2000) and other policies and procedures proposed for MSS systems operating at 2 GHz. Globalstar's presentation is summarized on the enclosed outline and in the "Supplemental Comments of Globalstar, L.P." filed in this docket on February 17, 2000.

Pursuant to Section 1.1206(b)(2) of the Commission's Rules, two copies of this letter with the enclosure are submitted for the record of the proceeding identified above. Please direct any inquiries regarding this matter to the undersigned.

Respectfully submitted,

William D. Wallace

Enclosure

cc: Mark Schneider

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Globalstar

Authorization of 2 GHz MSS Systems

IB Docket No. 99-81

February 23, 2000

AUTHORIZATION OF 2GHz MSS SYSTEMS

Globalstar.

- The 2 GHz Bands should only be assigned to next generation MSS systems in the USA.
- Next Generation MSS Systems must provide enhanced services such as e-mail, web-browsing, video conferencing and multi-media. Customers will demand "hand held" Internet available globally with dual mode operation terrestrial and satellite providers.
- 3G Technologies recently standardized by the ITU can provide these services. Leading technologies are WCDMA & cdma2000.
- 3G Technologies and the adaptations to satellite systems will require segments of contiguous spectrum 10 - 15 MHz in width. Additional CDMA spreading gain is needed to support the higher data rates of enhanced services.

AUTHORIZATION OF 2 GHz MSS SYSTEMS

Globalstar

- If bandwidth available to 2 GHz MSS Systems is not sufficient to offer 3G services, the potential for rural and unserved areas to access enhanced services via satellite is doubtful.
- By maintaining a high degree of commonality with leading terrestrial technologies, consumers and businesses worldwide can reap the benefit of reduced terminal costs. - Particular benefits to public safety organizations.
- The proposed "home" spectrum segment of 35 MHz/N will not allow an economically viable next generation MSS system offering enhanced services to consumers in U.S. markets.

AUTHORIZATION OF 2 GHz MSS SYSTEMS

Globalstar

- Restricting the bandwidth for 2 GHz MSS systems in the U.S. will result in a mismatch of bandwidth and services between the U.S. and the rest of the world.
- A substantial mismatch in bandwidth would make roaming into the U.S. less attractive to foreign subscribers, and enhanced services offered outside the U.S. would likely not be accessible from handsets sold in the U.S.
- The U.S. cannot adopt a "wait and see" approach to the band plan for 2 GHz. Certainty in technical capabilities is needed early on for developing the satellite system, securing financial support, attracting service providers and completing international coordination.

AUTHORIZATION OF 2 GHz MSS SYSTEMS

Globalstar.

- A "small piece for everyone" policy will ensure that no MSS systems except ICO Global will ever be able to exploit the 2 GHz spectrum.
- The scarcity of 2 GHz spectrum requires the use of technologies that support frequency sharing.

	Availability of Services to a Handheld User Terminal with Various Spectrum Assignments			
Service Type (with examples)	3.88 MHz	5 MHz	10 MHz	15 MHz
Voice and Messaging Voice Paging and SMS[1]	Yes	Yes	Yes	Yes
Low Speed Data E-mail w/o attachment Low speed data transfer Data Transactions[2]	Yes	Yes	Yes	Yes
Medium Speed Data E-mail w/ attachments Internet access File and image transfer Database/LAN access	Yes	Yes	Yes	Yes
High Speed Data & Low Speed Multimedia Higher speed internet access Videophone Compressed video data services Remote Medicine	**No**	**No**	Yes	Yes
Medium Speed Multimedia Video conferencing Distance learning	**No**	**No**	Yes	Yes
High Speed Multimedia Interactive multimedia Interactive Video	**No**	**No**	**No**	Yes

Figure 1

1. SMS= Short Messaging Service, a low capacity message service provided by GSM terrestrial systems.
2. Data transactions are short data transmissions typical of credit card verifications and Automatic Teller Machine transactions.