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December 20, 2002

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 December 19, 2002, William F. Adler of Globalstar, L.P., Phil Marchesiello of Akin Gump Strauss Hauer & Feld, LLP, representing the Official Creditors Committee of Globalstar, L.P., and the undersigned participated in a meeting with Paul Margie, Legal Advisor to Commissioner Copps, regarding Globalstar, L.P.'s and the Creditors Committee's positions on issues related to a pending petition for rulemaking filed by Iridium Satellite LLC and its relation to issues in the above-referenced docket.

The enclosed handout was distributed at the meeting. In addition, we noted that the authorization for the Iridium system restricts construction for operation to the band 1616-1626.5 MHz, rather than 1615.5-1626.5 MHz, as sought in the petition. We also expressed the view that the issues raised by Iridium Satellite LLC are separate from the issues concerning grant of Ancillary Terrestrial Component ("ATC") authority to MSS licensees. We pointed out that Iridium has presented no factual, legal or public policy justification for tying Globalstar's right to implement ATC to the Commission's possible consideration of re-dividing the Big LEO L-band between CDMA and TDMA systems. Furthermore, while Globalstar does not believe that Iridium has made even a *prima facie* case for considering its petition, we stated that the Commission should consider Iridium's petition, if at all, in a discrete proceeding, not in the context of IB Docket No. 01-185. The record with regard to ATC has long been complete, and the matter is ripe for decision.

We also explained why maintaining the capabilities of the existing Globalstar system through access to sufficient spectrum to provide robust satellite services, as well as ATC authority, is important to the future of Globalstar in obtaining new

Ms. Marlene H. Dortch
December 20, 2002
Page 2

investment in the company and emerging from its restructuring as a strong competitor in the satellite services marketplace.

We gave Mr. Margie a copy of the letter filed in this docket by Globalstar, L.P., and Globalstar USA LLC on December 18, 2002.

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

Respectfully submitted,

A handwritten signature in black ink, appearing to read "W. Wallace", with a long horizontal line extending to the right.

William D. Wallace

Enclosure

GLOBALSTAR, L.P.



DISCUSSION POINTS RE:
IRIDIUM PETITION FOR RULEMAKING
DECEMBER 19, 2002

Globalstar

IRIDIUM PROPOSALS

- Reconsider spectrum assignments in 1610-1626.5 MHz band between CDMA and TDMA MSS systems
 - Assign 1610-1615.5 MHz to CDMA system (currently Globalstar)
 - Assign 1615.5-1626.5 MHz to TDMA system (exclusively Iridium)
 - Note: FCC intention was to reconsider only 1618.25-1621.35 MHz

JUSTIFICATION AND RESPONSE

- Existing and future demand for Iridium services justifies redistribution of spectrum
- Current spectrum split imposes technical “constraints” on Iridium
- Iridium’s petition provides no factual information to justify claimed demand
- Globalstar believes it has 3X - 4X number of subscribers
- Iridium chose its TDMA system architecture with full awareness of shortcomings
- No factual support

JUSTIFICATION AND RESPONSE

- Additional spectrum is needed to provide aviation safety services.
- No factual support whether Iridium meets FCC and ICAO standards for aviation safety services
- Additional spectrum is needed to provide service to rural areas in other countries.
- Individual administrations decide CDMA/TDMA split.
- Plenty of capacity for rural service

JUSTIFICATION AND RESPONSE

- Iridium will have difficulty putting both forward and return ATC links in 5.15 MHz
- Iridium would be at a competitive disadvantage to MSS systems that can offer ATC
- Increased 1.6 GHz bandwidth will not significantly improve Iridium's ability to provide ATC in the band
- Consumers should not be denied ATC over MSS systems with more flexibility as a result of Iridium's choice of design

Globalstar

IMPACT ON GLOBALSTAR

- Iridium claims that spectrum reassignments could be accomplished “without material harm” to Globalstar
- Globalstar user terminals are hardwired with an emissions mask at 1621.35 MHz, necessary to protect Iridium users, pursuant to a 1996 agreement with Iridium on global use of 1.6 GHz band and European and ITU standards

Globalstar

IMPACT ON GLOBALSTAR

- Globalstar system (like all Big LEO systems except Iridium) was designed to use the full 1.6 GHz spectrum for uplinks and 2.4 GHz spectrum for downlinks
- Globalstar services and capacity are limited by the number of *paired* links
- Iridium proposal slashes paired links from nine to four (using 1.25 MHz channels)

IMPACT ON GLOBALSTAR

- Globalstar system (like all Big LEO systems except Iridium) was designed to use the full 1.6 GHz spectrum for uplinks and 2.4 GHz spectrum for downlinks
- Radionavigation satellite systems must be protected below 1610 MHz, also restricting usage of lower CDMA channels.
- In 1610.6-1613.8 MHz, radioastronomy operations still must be protected, making the lower three uplink channels not usable at certain times in certain areas. Users must be moved to upper channels.

EQUITABLE CONSIDERATIONS

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- Iridium chose bidirectional use of 1.6 GHz band in order to obtain exclusive spectrum assignment and to avoid stringent protection for RNSS and RAS.
 - Globalstar was designed to accommodate sharing. It was the FCC's decision to allocate shared spectrum, and it has not precluded new Big LEO CDMA applicants.

IRIDIUM DOES NOT NEED MORE 1.6 MHz SPECTRUM

- Expansion spectrum available to Iridium through its 2 GHz MSS license
- Next generation Iridium Big LEO system can be built to share 1.6 GHz band as uplink and 2.4 GHz band as downlink
- Globalstar has supported sharing with properly designed CDMA and TDMA MSS systems