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November 3, 2006

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: IB Docket Nos. 02-364 and 03-66

Dear Ms. Dortch:

At a meeting on October 31, 2006, with members of the Commission's International and Wireless Bureaus and Office of Engineering and Technology,^{1/} Globalstar, Inc. ("Globalstar") presented its reasons for opposing the Petition for Partial Reconsideration filed in the above-referenced proceeding by BellSouth and the supporting comments filed by WCA. Globalstar wishes to supplement its presentation as follows.

In their pleadings, BellSouth and WCA cited the work carried out by ITU-R Joint Task Group (JTG) 6-8-9 in deriving PFD limits for the 2500 – 2690 MHz band as relevant to this proceeding. It must be emphasized, however, that only spectrum above 2500 MHz was considered by this Group and the resulting PFD limits were based on that consideration. Extending these limits below 2500 MHz based on the deliberations of JTG 6-8-9 is highly questionable, if not downright misleading. These limits are not applicable in the band below 2500 MHz, which is occupied by a variety of users and uses, and tightening the PFD limits in the bands below 2500 MHz is not on the agenda of next year's World Radiocommunication Conference.

As was pointed out at our meeting, imposition of the PFD limits proposed by BellSouth and WCA would greatly curtail the capacity of the Globalstar system in the channels occupying 2495 – 2500 MHz and would impact the ability of the Globalstar system to serve its customers, which include many federal, state and local public safety agencies and first responders.

^{1/} See Globalstar, Inc. *Ex Parte* Notice, filed October 31, 2006 in IB Docket Nos. 02-364 and 03-66 and RM 10586.

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Pursuant to Sections 1.49(f) and 1.1206(b) of the Commission's rules, a copy of this letter has been filed electronically.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Josh L. Roland", with a long horizontal flourish extending to the right.

Josh L. Roland
Counsel to Globalstar Inc.

cc: Howard Griboff
John Martin
Paul Locke
Lisa Cacciatore
Jamison Prime
Patrick Forster
Nicholas Oros
John Schauble
Nancy Zaczek