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June 14, 2007

The Honorable Kevin J. Martin
Chairman
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: RM No. 11339 — Request by Globalstar, Inc. To Expand Its Ancillary Terrestrial Component ("ATC") Authority To Encompass Its Full Assigned Spectrum;

IB Docket No. 02-364 — Review of the Spectrum Sharing Plan among Non-Geostationary Orbit Mobile Satellite Service Systems in the 1.6/2.4 GHz Bands

Dear Chairman Martin:

I am writing to request that the Commission take the next step to enable Globalstar to provide to its customers the benefits of an Ancillary Terrestrial Component (ATC) in conjunction with its Mobile Satellite Services (MSS). The necessary next procedural step is to issue a Notice of Proposed Rulemaking (NPRM) proposing to expand Globalstar's ATC authorization to place the company on an equal footing with its prospective MSS/ATC competitors.

As you know, in January 2006 the Commission authorized Globalstar to provide ATC in conjunction with its MSS services. However, for reasons that no longer apply, the Commission's rules currently confine Globalstar's ATC authority to less than half of its MSS spectrum, unlike all other MSS carriers, which the rules allow to offer ATC in their entire spectrum. A year ago this month, Globalstar filed a Petition for Rulemaking asking the Commission to consider eliminating this disparate treatment of Globalstar. The comment rounds on that petition were completed in September 2006; the petition was in large part unopposed. Yet the Commission has not yet taken the next step of issuing a NPRM to initiate the final process of considering the necessary change in the rules.

As Globalstar has shown in its petition and related filings, Globalstar is the sole MSS provider that is capable today of integrating ATC services with its existing satellite constellation. Indeed, as far back as 2002, Globalstar held trials in Washington, D.C. and New York City in which it successfully completed ATC calls using its MSS satellites and a modified dual-mode handset. Once fully deployed, Globalstar's MSS/ATC system will enable Globalstar to offer truly ubiquitous voice and data communications solutions to its first responder and commercial customers, while making more efficient and intensive use of its spectrum resource. For example, in urban areas where buildings and other structures typically block satellite signals, ATC will allow Globalstar to provide more reliable mobile communications services in response to emergencies and natural disasters. At the same time, ATC will enable Globalstar to offer

expanded telecommunications capabilities in rural and remote areas. ATC will make it possible for Globalstar to offer local and long distance telephone service, broadband, fax, and data services to customers in those areas at a low cost as compared to terrestrial providers.

Because ATC offers these significant benefits, Globalstar has worked hard and continues to do so to make its ATC system a reality. Globalstar is in active discussions with prospective partners and equipment manufacturers about implementing ATC. Globalstar recently began selling its newest generation handset, the GSP-1700, which can easily be adapted to incorporate ATC functionality. And Globalstar is nearly one year into the \$1.2 billion design and construction of its second generation constellation and associated ground equipment. Once launched, the satellites will position Globalstar to provide reliable, efficient, and affordable MSS/ATC voice and data services through at least 2025.

As Globalstar repeatedly has emphasized, the FCC's inaction on its ATC petition stands in the way of its moving forward with plans for ATC deployment. Globalstar and its prospective strategic partners cannot crystallize their ATC plans without knowing whether they can provide ATC in 11 MHz, or 27.85 MHz, or something in between. In the comments on Globalstar's petition, no interference or other concerns were raised with respect to the unshared parts of Globalstar's spectrum. Nothing prevents the Commission in a NPRM from addressing the different portions of Globalstar's spectrum differently— for example, by inviting specific technical presentations on the feasibility of providing ATC in the shared portions. By its nature, a NPRM need not resolve any issues, but only tee them up. Until the FCC issues the NPRM, Globalstar remains stymied in its efforts to conclude a business plan, secure additional funding, and bring the benefits of ATC to its customers.

We understand that, because the feasibility of ATC in spectrum shared with other mobile uses is uncertain, Globalstar's ATC petition may be entangled with Iridium's request in IB Docket No. 02-364 to gain access to more of Globalstar's CDMA MSS assignment at 1.6 GHz. We reiterate that Iridium has put nothing in the record in that proceeding that would support a finding in the public interest that Iridium is entitled to access any more of Globalstar's spectrum. Globalstar has fully documented the harm that would result if the FCC were to force shared use of the spectrum and has shown that, in the United States, Iridium is not even using the portion of Globalstar's spectrum to which it already has access. In any event, the pendency of that proceeding is no obstacle to the Commission's issuance of a NPRM on Globalstar's ATC petition, which is a necessary step before the issues – including any relationship between the two proceedings – can be resolved. The sharing proceeding has been pending for almost 3 years, and is consuming my senior staff's time and effort, not to mention many thousands of dollars in legal and consulting fees. I must tell you candidly, as a businessman and chief executive officer, that three years is an unconscionably long period of regulatory uncertainty for my company. To the extent the FCC views its outcome as linked to Globalstar's ATC petition, then I urge the FCC to move forward on both proceedings simultaneously.

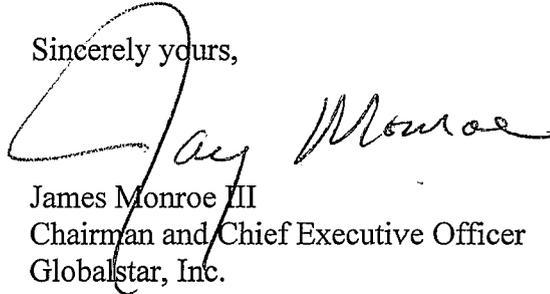
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I appreciate your prompt consideration of the concerns expressed above. I reiterate that I am available to meet with you or to discuss the issues by telephone whenever your schedule permits.

Sincerely yours,

A handwritten signature in cursive script that reads "James Monroe III". The signature is written in black ink and is positioned above the typed name and title.

James Monroe III
Chairman and Chief Executive Officer
Globalstar, Inc.

cc: The Honorable Barbara Boxer
The Honorable Diane Feinstein
The Honorable Lisa Murkowski
The Honorable Gordon Smith
The Honorable Anna G. Eshoo
The Honorable Mike Honda
The Honorable Zoe Lofgren
The Honorable Ellen Tauscher
The Honorable Don Young
Commissioner Michael J. Copps
Commissioner Jonathan S. Adelstein
Commissioner Deborah Taylor Tate
Commissioner Robert J. McDowell
Michelle Carey
Erika Olsen
Bruce Gottlieb
Barry Ohlson
Aaron Goldberger
Angela Giancarlo
Helen Domenici