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December 13, 2013

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

Re: *Ex Parte* Notice: *Terrestrial Use of the 2473-2495 MHz Band for Low-Power Mobile Broadband Networks* – IB Docket No. 13-213; RM-11685; *Revision of Part 15 of the Commission's Rules to Permit Unlicensed National Information Infrastructure (U-NII) Devices in the 5 GHz Band* – ET Docket No. 13-49; *Iridium Constellation LLC Petition for Rulemaking to Promote Expanded Mobile Satellite Service in the Big LEO MSS Band* – RM-11697

Dear Ms. Dortch:

On December 11, 2013, Anthony Navarra, President, Global Operations for Globalstar, Inc. ("Globalstar") and L. Barbee Ponder IV, General Counsel & Vice President, Regulatory Affairs, for Globalstar, met with Philip Verveer, Senior Counselor to Chairman Thomas Wheeler. On December 12, 2013, Mr. Navarra, Steve Berman of Lawler, Metzger, Keeney & Logan, LLC, and I met with Jonathan Chambers, Chief of the Commission's Office of Strategic Planning & Policy Analysis, and Ronald Repasi, Mark Settle, Navid Golshahi, Bryant Wellman, and Patrick Forster from the Commission's Office of Engineering and Technology. At these meetings, Globalstar's representatives provided an update on Globalstar's second-generation mobile satellite service ("MSS") operations and addressed issues related to the above-captioned proceedings. The attached presentation was provided to Commission staff at these meetings.

At the meetings, Globalstar expressed support for the Commission's proposal to allow Globalstar to provide low-power terrestrial mobile broadband service in its own licensed spectrum at 2483.5-2495 MHz and adjacent, unlicensed spectrum at 2473-2483.5 MHz.[1] Globalstar noted that the proposed rules would quickly add 22 megahertz to the nation's wireless broadband spectrum inventory and ease the congestion that is diminishing the quality of Wi-Fi service at high-traffic 802.11 hotspots and other locations. Globalstar's representatives also addressed the Commission's proceeding on its rules governing the use of the 5 GHz band by

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[1] *Terrestrial Use of the 2473-2495 MHz Band for Low-Power Mobile Broadband Networks; Amendments to Rules for the Ancillary Terrestrial Component of Mobile Satellite Service Systems,* Notice of Proposed Rulemaking, IB Docket No. 13-213 (rel. Nov. 1, 2013).

Unlicensed National Information Infrastructure ("U-NII") devices.[2] As demonstrated in an independent technical report recently filed by Globalstar, outdoor deployment of unlicensed devices in the U-NII-1 band would cause significant harmful interference to Globalstar's licensed MSS feeder uplinks in the 5 GHz band, which in turn would diminish Globalstar's satellite power availability, user capacity, and geographic service availability.[3] Consistent with its rules and policies protecting licensed services from harmful interference from unlicensed operations,[4] the Commission should maintain its prohibition on outdoor operations in the U-NII-1 band.

Finally, Globalstar's representatives expressed their opposition to the February 2013 Petition for Rulemaking filed by Iridium Constellation LLC ("Iridium").[5] Iridium's Petition provides no support for its request to take three megahertz of Big LEO spectrum away from Globalstar. Reassignment of Globalstar's licensed spectrum to Iridium would have a disastrous effect on Globalstar's global MSS operations and cause significant harm to public safety and the customers who rely on Globalstar's services.

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

Respectfully submitted,

/s/ *Regina M. Keeney*
Regina M. Keeney

cc: Philip Verveer
Jonathan Chambers
Ronald Repasi
Mark Settle
Navid Golshahi
Bryant Wellman
Patrick Forster

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[2] *See Revision of Part 15 of the Commission's Rules to Permit Unlicensed National Information Infrastructure (U-NII) Devices in the 5 GHz Band*, Notice of Proposed Rulemaking, 28 FCC Rcd 1769 (2013).

[3] Supplemental Comments of Globalstar, Inc., ET Docket No. 13-49 (Nov. 29, 2013) (attaching *Impact of Proposed U-NII-1 Rule Changes on Globalstar Operations*, Roberson and Associates, LLC (Nov. 27, 2013)).

[4] *See* 47 C.F.R. § 15.5(b).

[5] Petition for Rulemaking of Iridium Constellation LLC, RM-11697 (Feb. 11, 2013).

WASHINGTON, DC

December 2013

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1 Globalstar Background & Operational Overview

2 Mobile Satellite Products & Services

3 Globalstar's Worldwide Spectrum Holdings

4 Globalstar's Terrestrial Opportunity

1

GLOBALSTAR BACKGROUND & OPERATIONAL OVERVIEW

GLOBALSTAR BACKGROUND

- OTCBB: GSAT
- Headquartered in **Covington, LA** – relocated from Silicon Valley in 2010
- Offices in California (Milpitas), Ireland (Dublin), France (Toulouse), Brazil (Rio de Janeiro), Canada (Ontario) and Panama
- **266 employees worldwide**; 192 employees in USA; 109 employees in LA
- Owns and operates a constellation of LEO satellites
- Provides voice and data services over a **global footprint**
- Services over **560,000** government, public safety and enterprise customers as well as consumers
- **$2.2 billion** Enterprise value
- Over **2,800** Lifesaving rescues since 2007

Globalstar

THE WORLD'S MOST MODERN SATELLITE NETWORK

Globalstar recently completed the launch and deployment of 24 new satellites with a 15 year design life, years ahead of any competitive alternative.

Launch 1 – Oct '10

Launch 2 – July '11

Launch 3 – Dec '11

Launch 4 – Feb '13

Launch Campaign Highlights

- Four successful launches of six satellites each
- 24 new satellites now providing full commercial service
- 15-Year design life
- "Land-line quality" voice via satellite
- Fastest mobile data speeds

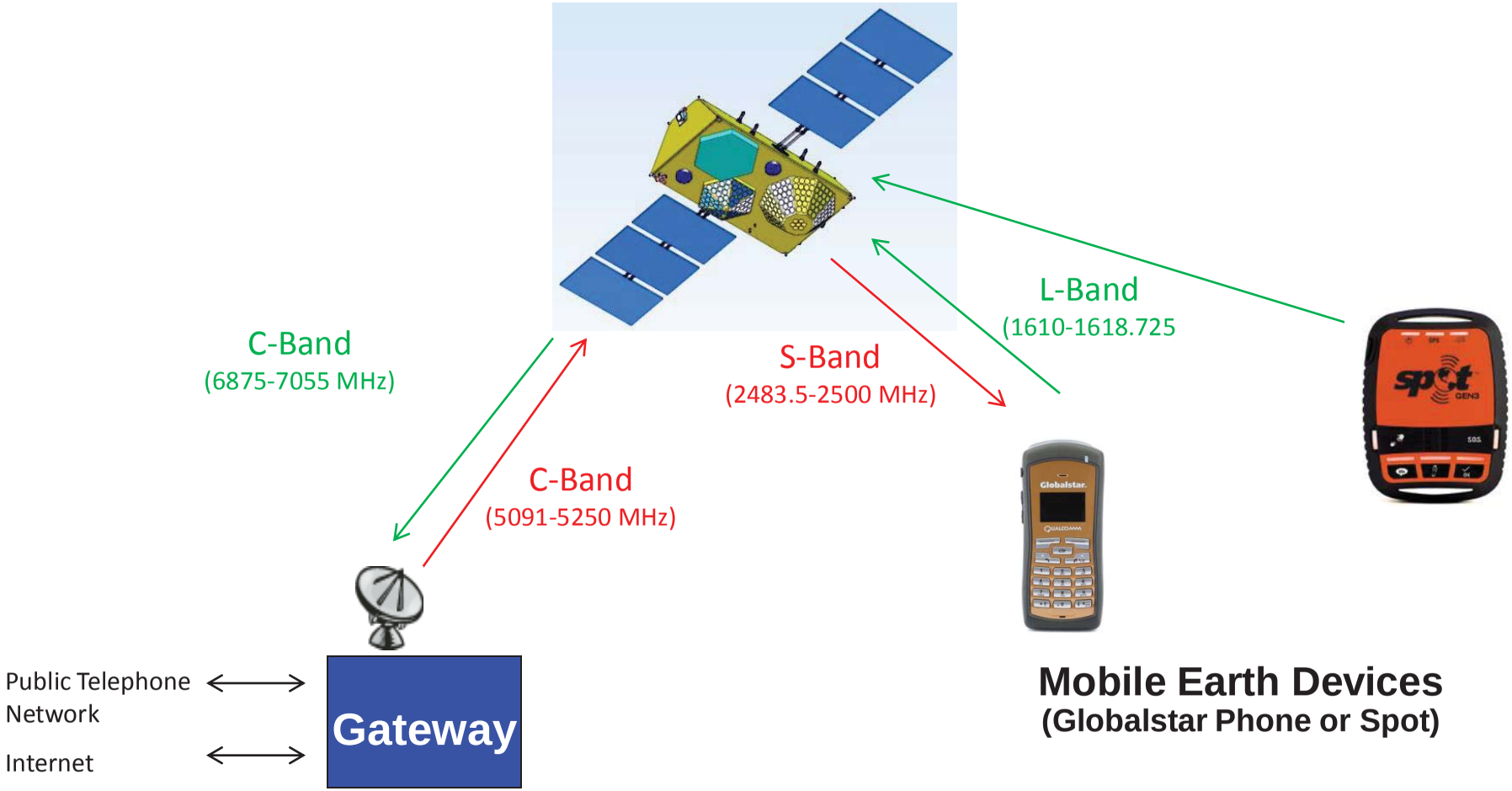
Globalstar

GLOBALSTAR GROUND STATIONS ON SIX CONTINENTS

* Globalstar retains 30% equity interest
** Globalstar retains 49% equity interest
***Able to receive telemetry from, and send control functions to, Globalstar satellites

Globalstar

GLOBALSTAR'S UNIQUE BENT-PIPE ARCHITECTURE

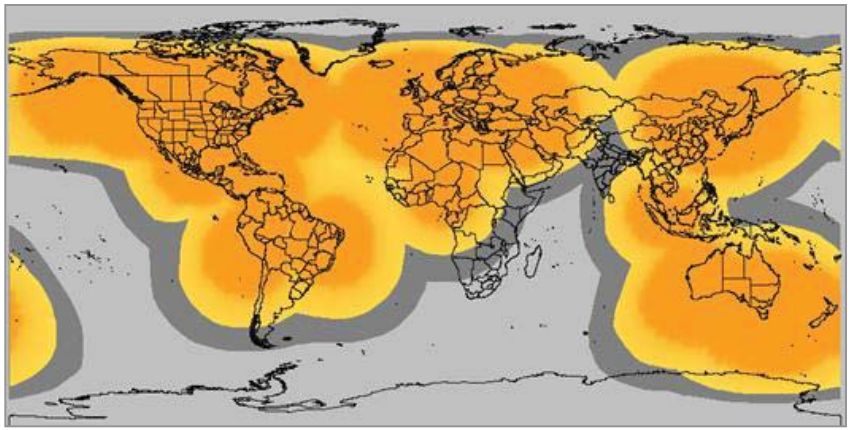


The "Brains" Of The Globalstar System Are Located On The Ground And Can Be Easily Upgraded To Ensure That Our Customers Always Have The Most Technologically Advanced Mobile Satellite Services

GLOBALSTAR'S WORLD-WIDE SATELLITE COVERAGE

SIMPLEX (ONE-WAY DATA)

WORLDWIDE – CURRENT TEXT, M2M, SMS COVERAGE



Probability of successfully sending a single message within 20 minutes:

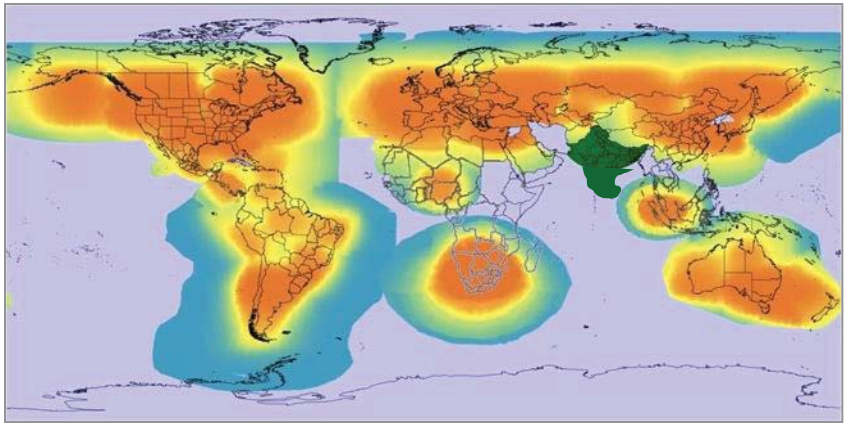
- ≥99%
- 96%-99%
- Reduced or no coverage available within 20 minutes
- No coverage

USE CASES:

- Vehicle Tracking
- S.O.S. Services
- Theft Detection
- Track Trans-Ocean Vehicle Shipments
- Know Instantly Where Everything Is Located

DUPLEX (VOICE AND TWO-WAY DATA)

WORLDWIDE – TWO-WAY COVERAGE (FULLY DEPLOYED)[1]



- Primary Globalstar Service Area
- Extended Globalstar Service Area
- Fringe Globalstar Service Area
- Potential Future Coverage Area[2]

USE CASES:

- CDMA-based, Land-Line Quality Voice Via Satellite
- Two-Way Data Services
- Substantial Total Capacity --- No Bottleneck
- Communications Continuity Post-Disaster When All Terrestrial Networks Fail

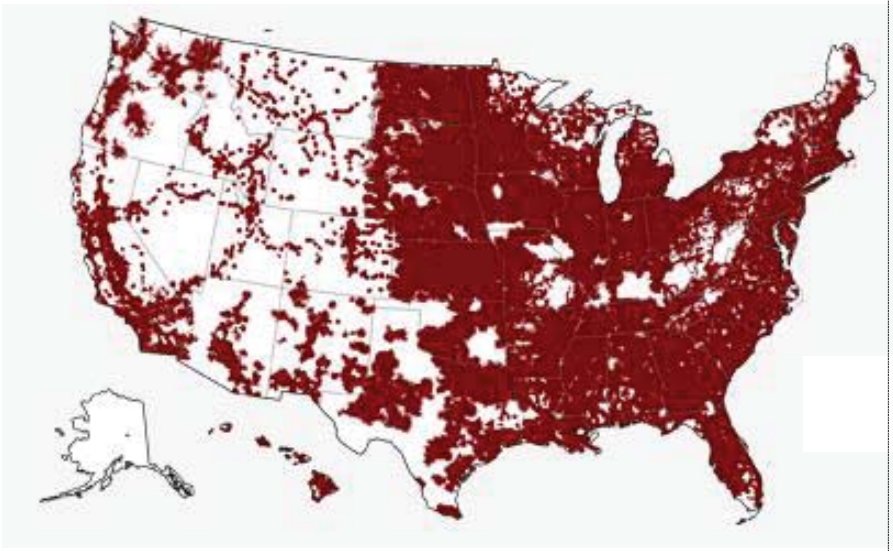
(1) Assumes duplex restoration and upgrades at South Africa, Nigeria, Saudi Arabia and Singapore gateways.
(2) Potential India deployment in 2014.

Greater coverage achievable with deployment of additional gateways

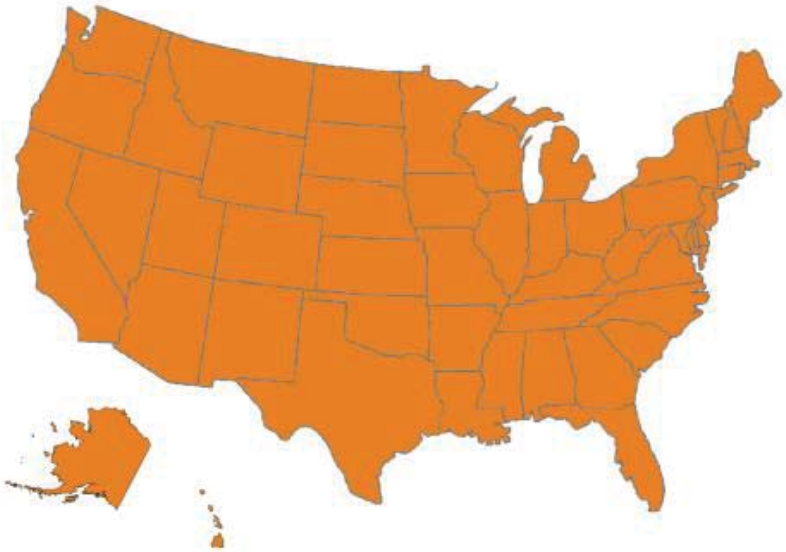
Globalstar

GLOBALSTAR PRESENTS THE WORLD'S FIRST POST-CELLULAR NETWORK

VERIZON US 4G LTE COVERAGE MAP



GLOBALSTAR'S COVERAGE



- Previously offered terrestrial wireless bands have suffered from considerable and highly disadvantageous geographic fragmentation in their license holdings.
- In contrast, Globalstar spectrum in the 1600 and 2400 MHz bands may be utilized continuously coast to coast with a single license – unique ITU worldwide allocation.

GLOBALSTAR'S TARGET MARKET

Globalstar

No Terrestrial Network

Areas Outside Cellular Networks

- Connectivity to nearly **one billion people who live, work and/or play in areas not covered by cellular service**
- **Over a billion people** work in industries that may require presence outside of cellular reach, such as Oil & Gas, Transportation and Forestry.
- **Over 150 million** adventure trips taken annually [1]
- The majority of the world's land mass is without terrestrial cellular coverage [2]

Failure of Terrestrial Network

Critical Mobile Satellite Services During Disasters

- Provides alternative network access in areas prone to natural disasters
- **Provides public safety** with needed connectivity when cellular service is down due to overloaded / failed infrastructure
- Enables basic services, NGOs, **emergency response** and business continuity
- **Hurricane Katrina and Sandy** are prime examples of Globalstar's ability to provide Critical Mobile Satellite Services

Existing Terrestrial Network

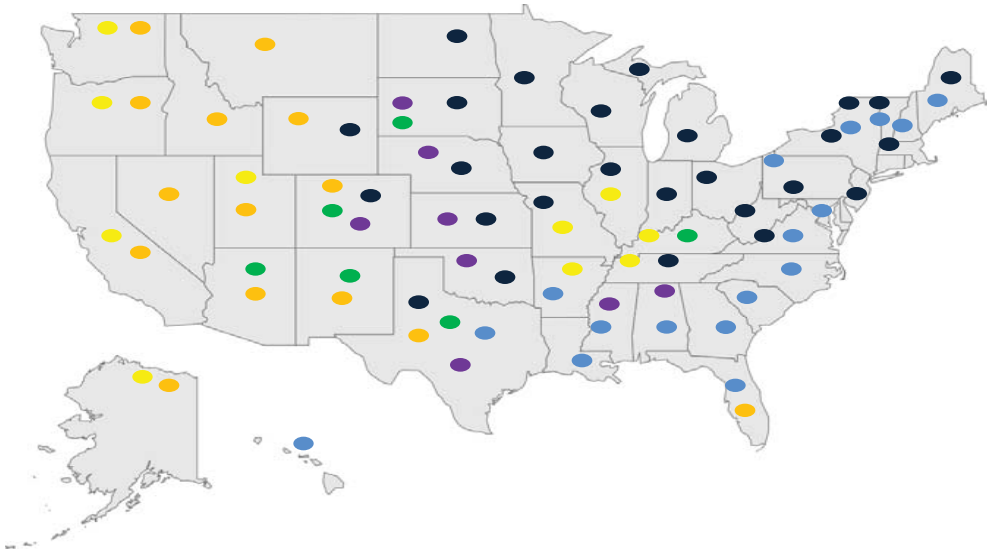
Asset Tracking / Low Cost Alternative to International Roaming

- Provides the ability to track anything, anywhere, anytime across the globe even where terrestrial networks exists
- Provides low cost alternative to international roaming charges when traveling abroad
  - Traditional cellular companies can charge upwards of $2 – $3 per minute versus Globalstar unlimited usages plans which charge as little as $0.12 per minute for worldwide coverage [3]
- The international roaming market is expected to reach **$67 billion by 2015** [4]

Source: *Adventure Tourism Market Report* by George Washington University, Adventure Travel Trade Association, Xola Consulting, Informa Telecoms & Media.
(1) Adventure Tourism Market Report by George Washington University, Adventure Travel Trade Association, Xola Consulting. Statistic based on survey conducted with participants in Latin America, North America, and Europe.
(2) CIA World Factbook, as of 2010.
(3) Based on current plan "Evolution III" at $49.99 / month assuming 400 minutes per month of usage.
(4) Informa Telecoms & Media (as reported by www.telecoms.com).

Globalstar

U.S.A. CONTINUOUSLY AFFECTED BY NATURAL DISASTERS



LEGEND:

- Earthquake Prone Areas
- Flash Flood Prone Areas
- Hurricane Prone Areas
- Ice Storm Prone Area
- Tornado Prone Areas
- Wildfire Prone Areas

Event	No. affected	Affected areas
Katrina	15.0 million	Florida, Alabama, Mississippi, Louisiana, Georgia
Sandy	17.5 million	Florida, North & South Carolina, Virginia, Washington, D.C., Maryland, Delaware, New Jersey, Pennsylvania, New York, New England
Tornadoes*	48.4 million	Texas, Oklahoma, Kansas, Nebraska, Colorado, South Dakota, Mississippi, Alabama
Earthquakes*	85.0 million	Washington, Oregon, California, Alaska, Utah, Arkansas, Tennessee, Kentucky, Missouri, Illinois

**** Represents population of states affected***

Globalstar

GLOBALSTAR'S MISSION-CRITICAL COMMUNICATIONS

Globalstar's MSS works when all terrestrial networks (wireline & wireless) fail. Globalstar successfully provided mission-critical communication services during and after Hurricanes Katrina & Sandy.

Satellite Images of Hurricane Katrina & Sandy

*Hurricane Katrina: Approximately **15 million** affected*
Source: www.huricanekatrinarelief.com

*Hurricane Sandy: Approximately **17.5 million** affected*
Source: Huffington Post

Letter from President George W. Bush to GSAT*

"I learned about your contributions to help the victims of Hurricane Katrina and Rita. Our nation is grateful to those who are helping their fellow citizens in need…..The good works of Globalstar demonstrate the character and strength of our nation"

Letter from Senator Landrieu to FCC*

"After Katrina, Globalstar had over ten thousand satellite phones operating in the Gulf coast region. As a result, I believe that allowing Globalstar the ability to continue providing these services well into the future will provide additional coverage and capacity in such post-disaster situations"

New York Power Authority's Letter to FCC*

"Recently, during and immediately after Hurricane Sandy our only means of communication into or out of our facilities located on Long Island was via satellite, over Globalstar's network"

**See appendices 1, 2 and 3 for all letters mentioned above*

Globalstar

GLOBALSTAR HAS REACHED AN INFLECTION POINT…

Full Constellation Restoration

- All second-gen satellites have been placed into service
- Duplex service coverage has continued to improve materially – customers return in growing numbers
- In Q3 2013, Duplex gross subscriber additions, minutes of use and ARPU increased 129%, 23% and 29%, respectively, over the prior year period

New Product Rollouts

- Three new products launched in 2013 including SPOT Global Phone, SPOT Gen3TM and SPOT TraceTM – a miniature consumer asset tracking device
- Three additional products to be launched over the coming quarters – designed to expand addressable market through lower cost and enhanced functionality

Financial Flexibility Through Refinancings

- Successfully exchanged 5.75% Notes in May 2013
- Amended and Restated COFACE Facility Agreement effective August 2013
- Facility amendment provides material improvement to debt repayment schedule and financial covenants
- $85 million Thermo equity commitment / backstop
- Company poised to make strategic investments to reach full revenue potential

FCC NPRM Released

- On November 1, 2013, the Federal Communications Commission ("FCC") voted unanimously to release Globalstar's requested Notice of Proposed Rulemaking ("NPRM") to provide a "Wi-Fi like" service over 22 MHz of spectrum including Globalstar's licensed MSS spectrum (2483.5-2495 MHz) and the adjacent ISM spectrum (2473-2483.5 MHz)
- The FCC has established a comment cycle of 75 days and 105 days after publication in the Federal Register for initial and reply comments, respectively

… AND IS STRATEGICALLY POISED FOR FUTURE GROWTH & PROFITABILITY

Globalstar

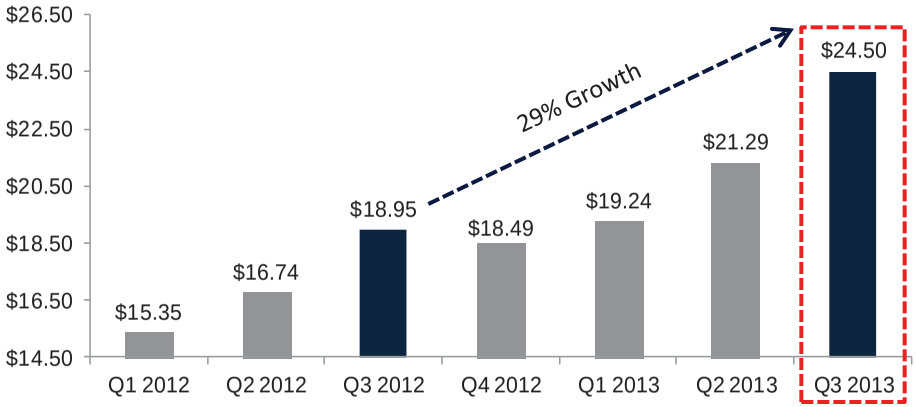
GLOBALSTAR DUPLEX IMPROVEMENT

Globalstar's core two-way business has experienced material growth as all second-gen satellites have been placed into service

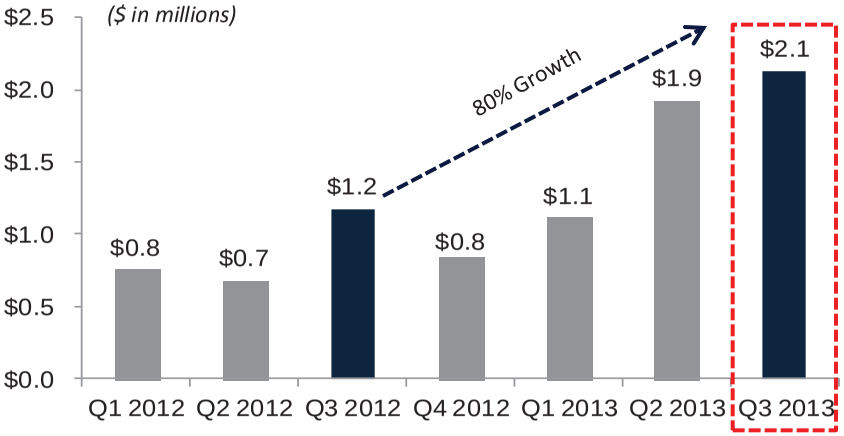
Key Highlights

- After years of decline, principal Duplex data points are experiencing material growth
- Rollout of SPOT Global Phone, the first-of-its-kind consumer oriented satellite phone, expands Globalstar's two-way market by leveraging our existing consumer network
- Usage on the network has increased significantly – 23% growth in minutes of use in Q3 2013 over the prior year period
- Gross subscriber additions of over 2x in Q3 2013 as compared to the prior year period
- Enterprise customers returning to Globalstar in key sectors such as Oil & Gas, Mining and Forestry, expanding market share in the MSS industry

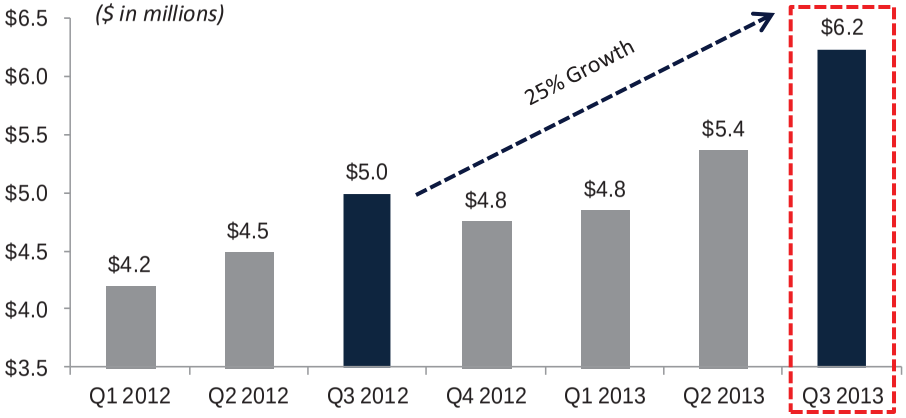
Duplex ARPU



Duplex Equipment Revenue



Duplex Service Revenue



Globalstar

2

MOBILE SATELLITE PRODUCTS & SERVICES

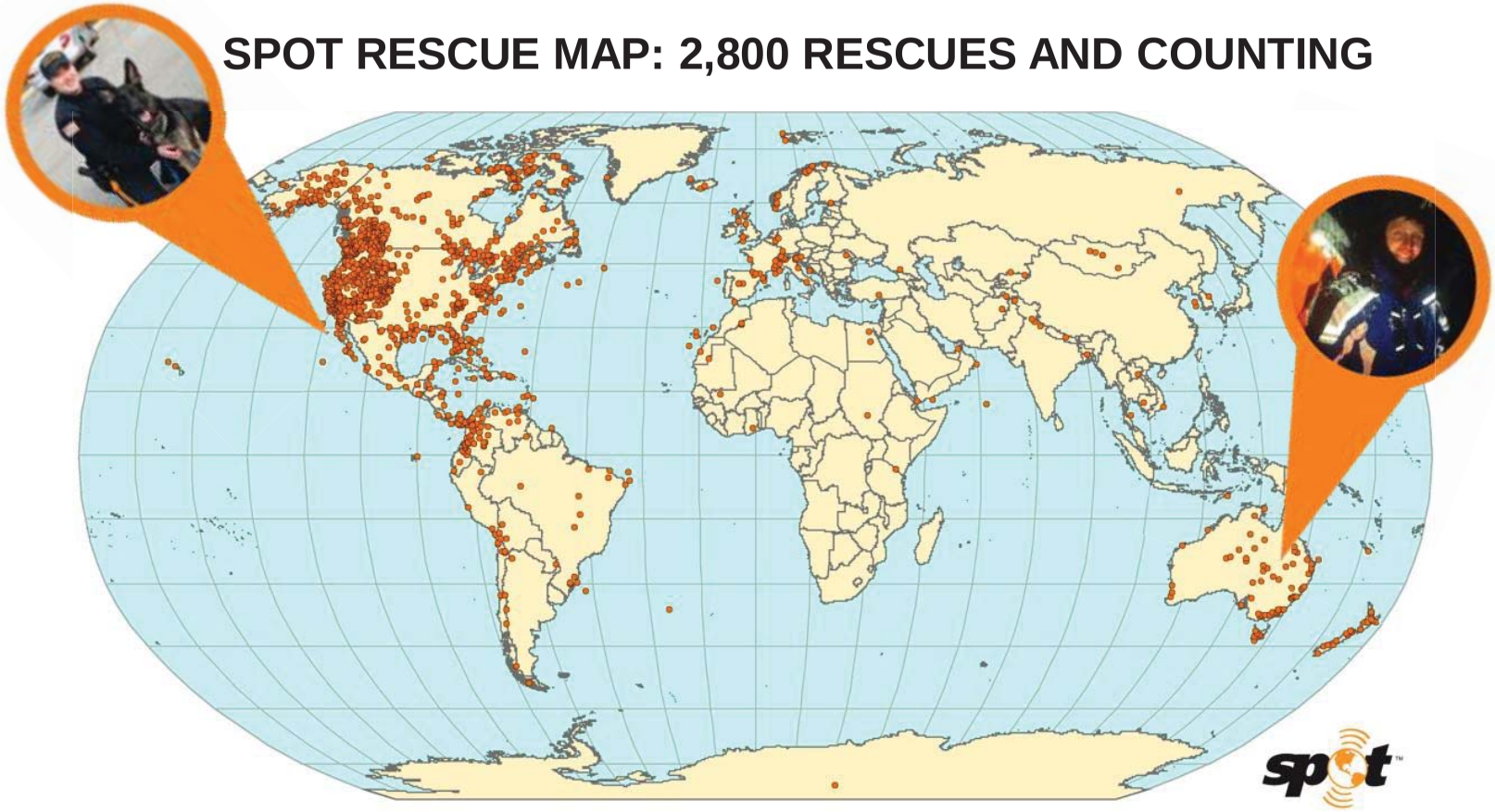
BROADENING MSS RELEVANCE WITH NEW PRODUCTS

Products Launched	SPOT Global Phone		• Small, lightweight, consumer-oriented satellite phone • Leverages the brand equity of SPOT in the recreational and consumer marketplaces • Portable device with a long battery life • Airtime pricing matches Duplex price plans
	SPOT Gen3™		• Battery life 2x SPOT 2 and Extreme Tracking available at 2.5 minute intervals • Enhanced customization features with smaller form factor • USB connection for line power eliminates the need for battery replacement
	SPOT Trace™		• Traces the path of anything, anytime, anywhere for consumer assets such as cars, ATVs, motorcycles, boats, etc. • Extremely small and inexpensive consumer asset tracking device • Key applications include theft prevention • Extreme Tracking offered at $99.99 per year • Broadens addressable market by targeting mass consumers • Leverages existing retail distribution channel
Upcoming New Products	STX3	 *Shown in relative size to a quarter*	• Smallest and most efficient simplex M2M transmitter in the market • Drives increased M2M addressable market with broadened customer appeal • Used in ASIC-based devices which enable equipment to be smaller, lighter, more cost effective and power efficient
	Universal Kit		• Feature-rich two-way communication device designed to penetrate the maritime industry • Rugged form factor built around the GIK-1700 cradle • Improved usability: water protection, amplified speaker phone & data connectivity via USB
	SPOT Gen3 Bluetooth		• SPOT Gen3B combines the functionality of the SPOT Gen3 along with SPOT Connect's enhanced smartphone pairing features via Bluetooth • Product economics similar to those of the SPOT Gen3

Globalstar

SPOT SERVICE — LIFE SAVING RECORD

- Since 2007, Globalstar's SPOT customers have initiated over 2,800 rescues globally, averaging 2 people per rescue.
- On average, Globalstar's SPOT customers are initiating 1 rescue everyday somewhere around the world.
- No other communications product has achieved the Life Saving Record of SPOT.



For additional information, please visit: http://www.findmespot.com/en/spotemergency/

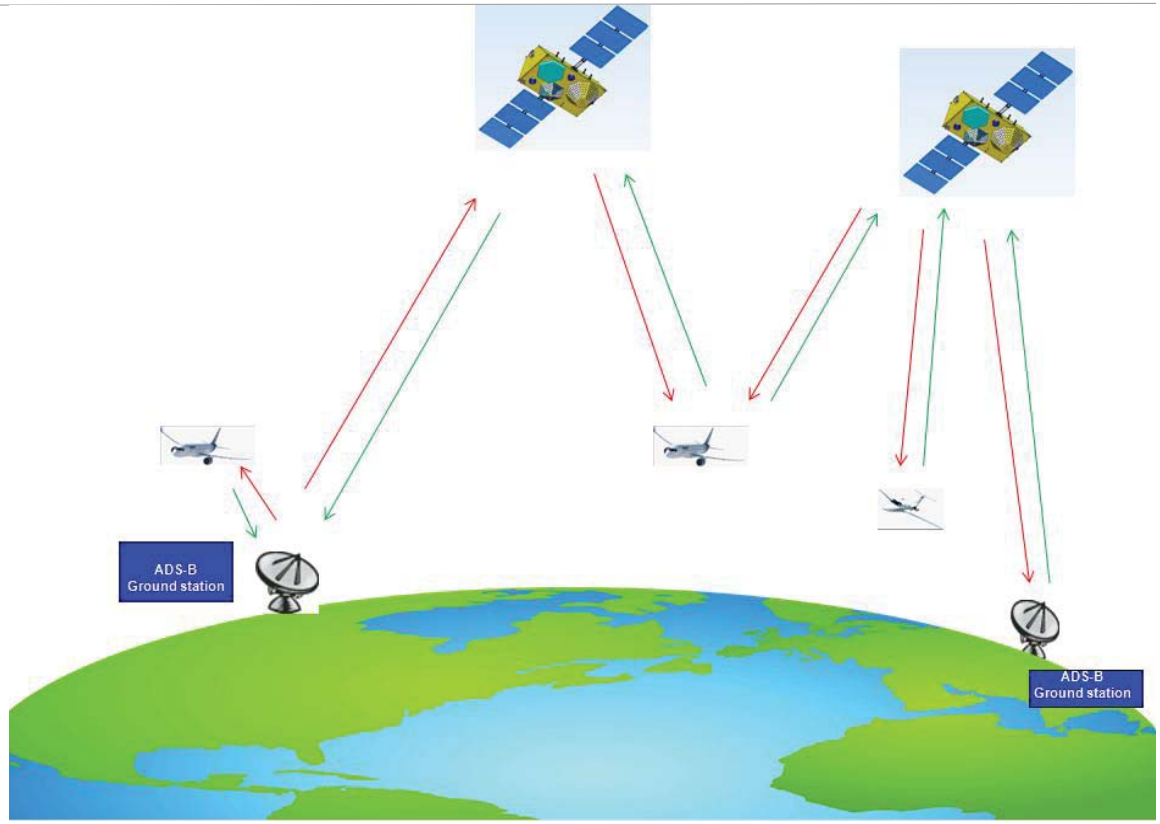
Globalstar

REAL TIME TRACKING OF AIRCRAFT IN FLIGHT

ADS-B LINK AUGMENTATION SYSTEM (ALAS) -- works where terrestrial ADS-B networks are not deployed (blue ocean) or are obstructed (mountain ranges)

Globalstar ADS-B Technologies

The following link displays the functionality of ALAS - ***http://youtu.be/kL48k0VC15Y***



If Globalstar can track aircraft real-time in flight for collision avoidance, Globalstar can do the same for any terrestrial objects.

See appendices 4 for further details

GLOBALSTAR'S EMERGENCY RESPONSE INTEROPERABLE COMMUNICATIONS – THE "ERIC" SYSTEM

System Overview

- Robust self-contained stand-alone cellular network
- Range from 100m up to 30km
- Automatically meshed together to create wide area coverage
- Dynamic reusable spectrum resource
- Satellite reach back to PSTN and/or PABX
- Users do not have to be in constant line of sight of the satellite
- Works with any standard 2G, 3G or LTE handset
- Highly flexible broadcasting capability

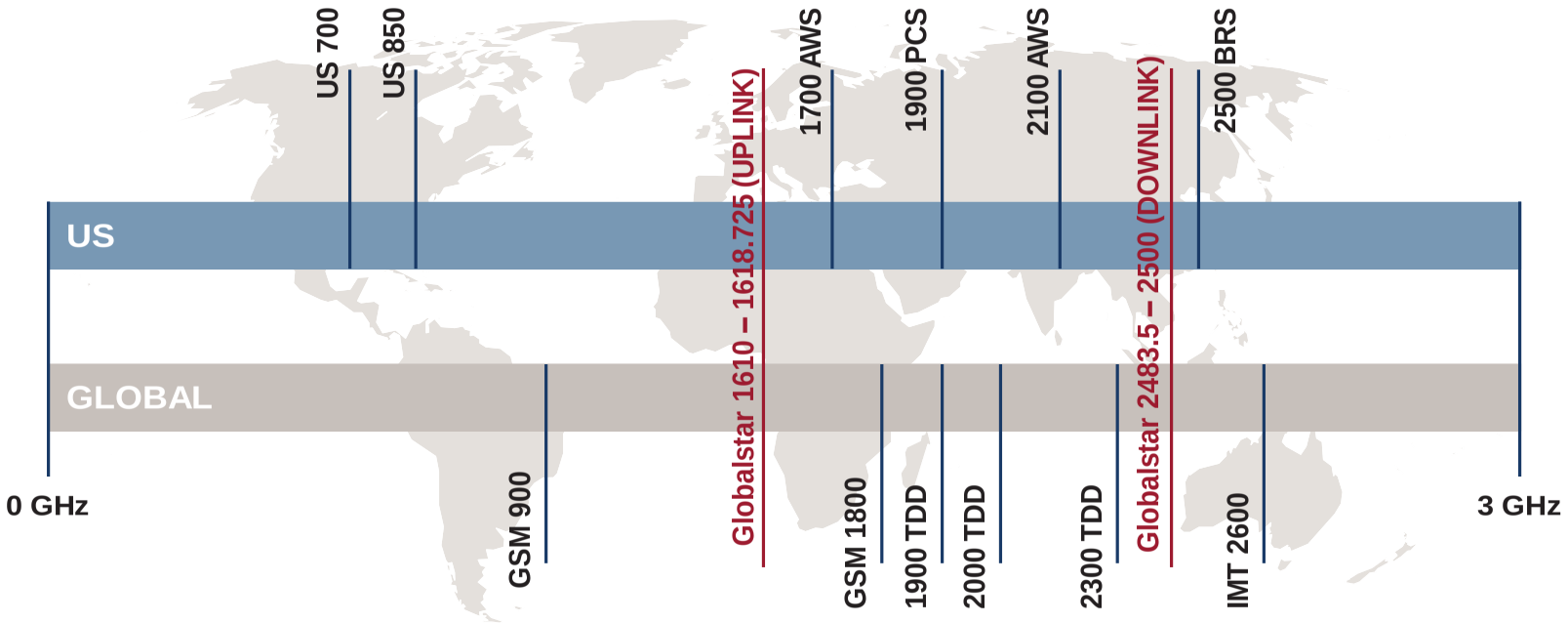
Globalstar

3

GLOBALSTAR’S WORLDWIDE SPECTRUM HOLDINGS

GLOBALSTAR'S SPECTRUM AUTHORITY

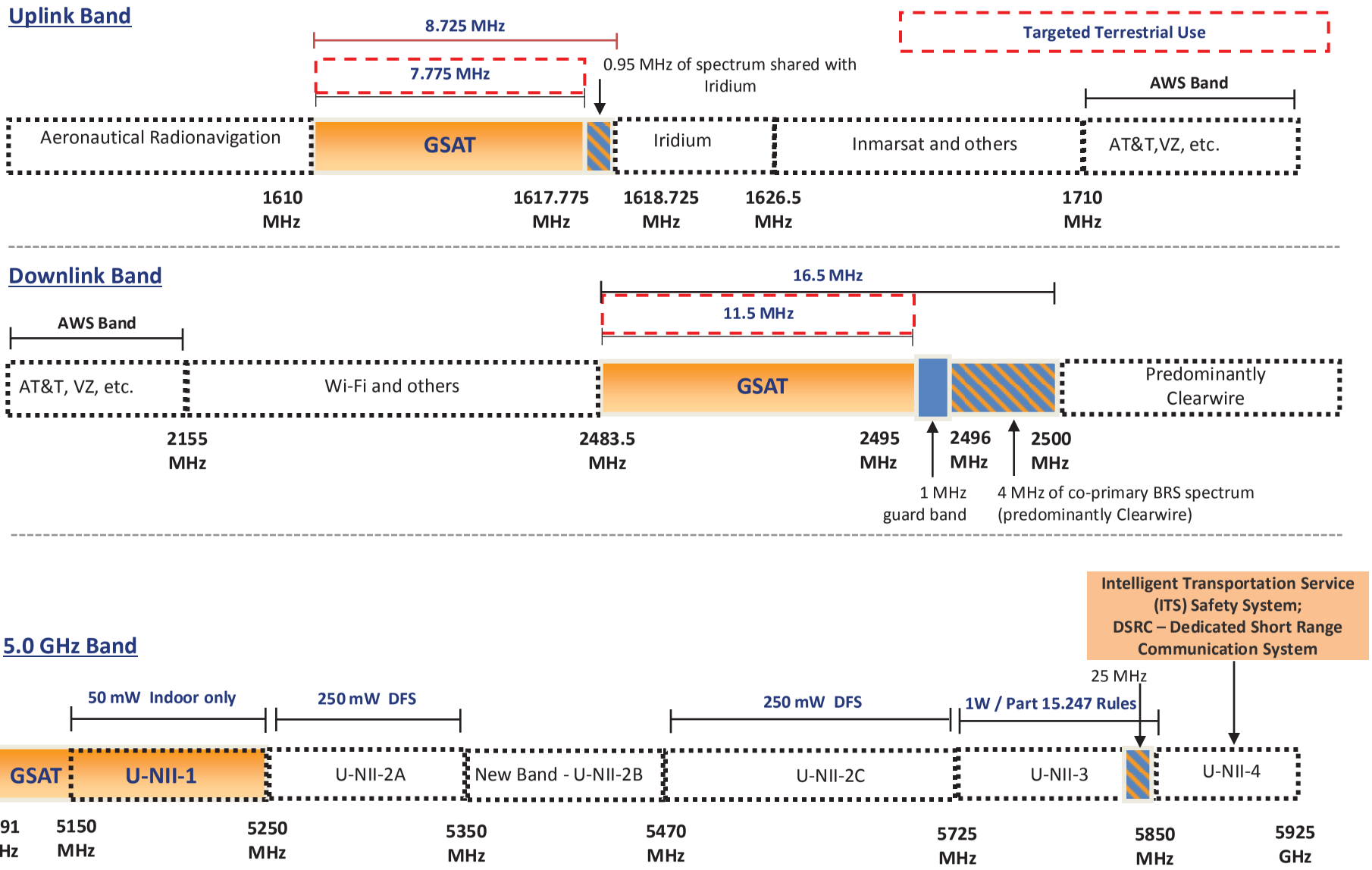
- Globalstar maintains internationally recognized frequency assignments from the International Telecommunication Union ("ITU"), a specialized agency of the United Nations, including:
  - 1610-1626.5[1] MHz – uplink communications from mobile / fixed earth terminals to satellites
  - 2483.5-2500 MHz – downlink communications from satellites to mobile / fixed earth terminals



- Additionally, Globalstar has an ITU authority to operate gateway feeder links at 5091-5250 and 6875-7055 MHz
- The ITU provides the allocation of the radiofrequency spectrum to various uses in addition to registering frequency assignments and orbital positions / characteristics
- 193 of the world's 195 countries, including all countries in the Asian continent, are Member States of the ITU and follow the ITU's guidelines

(1) Note, the FCC restricts Globalstar's first generation to operating on L-Band frequencies less than 1618.775 but the ITU assignments are to 1626.5 MHz.

GLOBALSTAR'S U.S.-LICENSED SPECTRUM



Globalstar

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GLOBALSTAR’S TERRESTRIAL OPPORTUNITY

WHAT IS TERRESTRIAL LOW POWER SERVICE (“TLPS”)?

- Terrestrial Low Power Service or “TLPS” is a **“Wi-Fi like”** mobile broadband service provided over Globalstar’s 2.4 GHz licensed spectrum once Globalstar receives terrestrial authority from the Federal Communications Commission.
- The **22 MHz-wide** TLPS channel is Channel 14, the **fourth non-overlapping channel** under the existing IEEE 802.11 Wi-Fi standard that is presently carrying approximately 80% of all mobile originated data in the United States.
- Preliminary test results have established the **superiority of TLPS** in terms of low noise and interference characteristics – which enhances its **range, capacity and speed**.
- Practically **all mobile Wi-Fi devices** including smart phones are **designed to operate on Channel 14 (TLPS)** – but are restricted due to regulatory constraints. However, once the FCC removes the regulatory restrictions, remote firmware updates can enable full use of Channel 14 frequencies.
- TLPS can dramatically **expand spectral capacity** to relieve existing Wi-Fi congestion.

GLOBALSTAR'S TERRESTRIAL PLANS

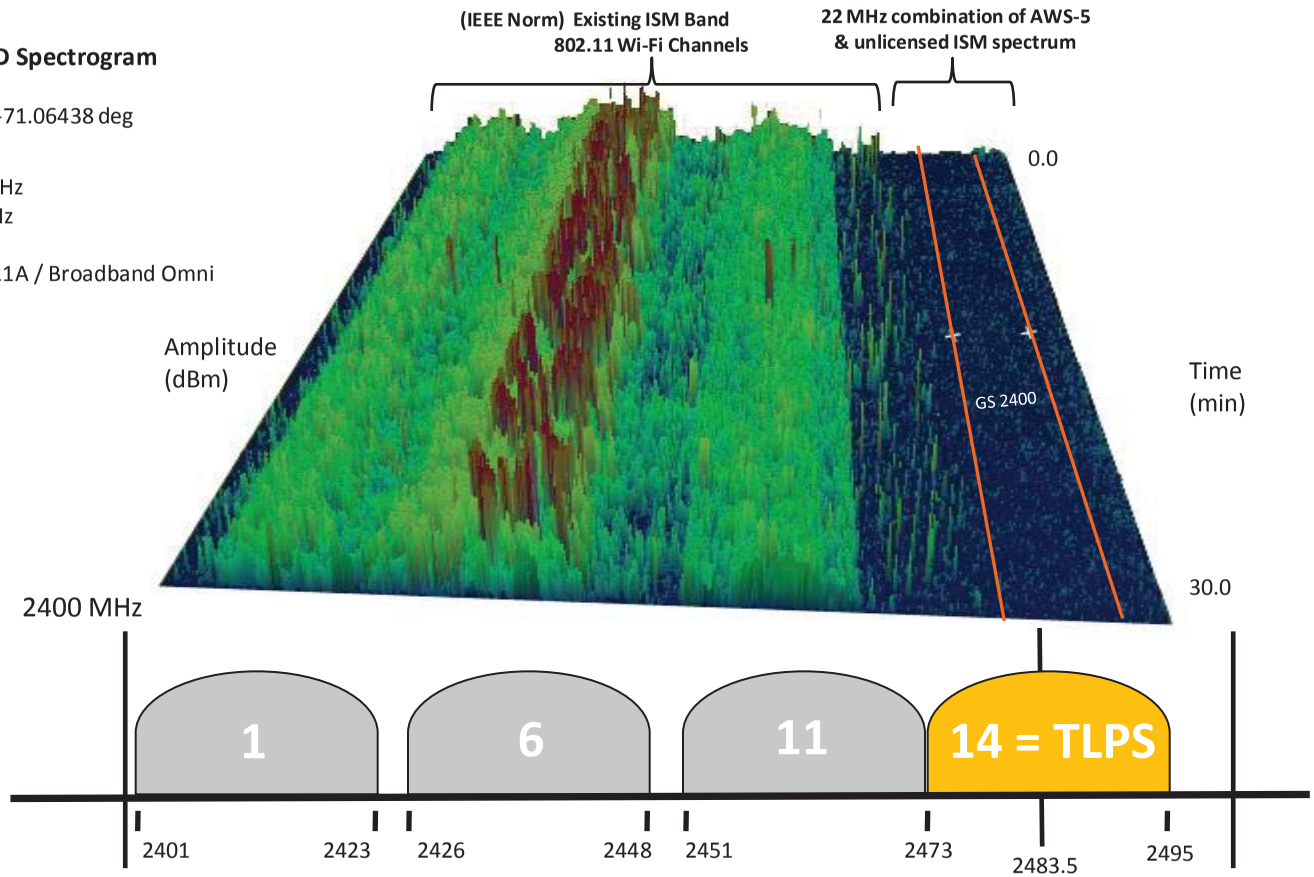
- **NearTerm Plan for 2.4 GHz Spectrum:** Obtain Advanced Wireless Services ("AWS")-5 license to provide terrestrial wireless services, including mobile broadband services such as Terrestrial Low Power Service and Long Term Evolution, within Globalstar's exclusively licensed 2.4 GHz spectrum
- **LongTerm Plan for 1.6 GHz Spectrum:** Add Uplink spectrum within the AWS-5 Terrestrial license for Low Power Uplink services between 1610 and 1617.775 MHz
- **FCC Votes to Release Globalstar Rulemaking:** In November 2013, the Federal Communications Commission ("FCC") unanimously voted to release Globalstar's requested Notice of Proposed Rulemaking ("NPRM") to provide a "Wi-Fi like" service over its spectrum (2483.5-2495 MHz) and the adjacent ISM spectrum (2473-2483.5 MHz)

Wideband 3D Spectrogram

42.36022 deg -71.06438 deg
(Boston, MA)

START: 2.40 GHz
STOP: 2.50 GHz

Anritsu MS2721A / Broadband Omni



Globalstar

TERRESTRIAL LOW POWER SERVICE ("TLPS"): A MANAGED, CARRIER-GRADE "WI-FI LIKE" SERVICE

TLPS provides immediate solution to acute "Wi-Fi Traffic Jam" — 2.4 GHZ unlicensed spectrum is exhausted without an alternative solution

"The Nation's demand for unlicensed services has increased so dramatically that we need more spectrum to support these services. The 2.4 GHz band, while critical to the success of Wi-Fi and other unlicensed technologies, is increasingly congested particularly in major cities. Densely populated centers are the most expensive geographic areas to deploy licensed networks." —Chairwoman Mignon Clyburn

CableLabs

"Consumers are likely to experience reduced coverage and throughput," and "Wi-Fi will become less useful, particularly for high bandwidth services like video." Wi-Fi Spectrum: Exhaust Looms, Rob Alderfer, CableLabs, at 12 (May 28, 2013). The 2.4 GHz Wi-Fi band will reach exhaustion by 2014, with a spectrum deficit of approximately 10 megahertz.

Google

Microsoft

2.4 GHz unlicensed spectrum "has become saturated during certain times of day in heavily trafficked areas such as city centers, apartment buildings, and public events. This congestion imposes a large cost on consumers because Wi-Fi is the most heavily used method of wireless broadband connectivity and the 2.4 GHz band is the core Wi-Fi band today." Comments of Google, Inc. and Microsoft Corporation, ET Docket No. 13-49, at 3 (May 28, 2013).

TLPS can provide an immediate 33% increase in the nation's Wi-Fi capacity over a carrier grade "SuperHighway" controlled by Globalstar

Globalstar

FCC'S NPRM HIGHLIGHTS

On November 1st, 2013, the FCC voted unanimously to release Globalstar's requested NPRM to provide a "Wi-Fi like" service over 22 MHz of spectrum including Globalstar's licensed MSS spectrum (2483.5-2495 MHz) and the adjacent ISM spectrum (2473-2483.5 MHz)

Major Highlights

First Recognizes Globalstar's commitment to MSS

Second Permits Globalstar to offer low power mobile broadband services

Third Substantially eliminates the ATC gating criteria as they relate to Globalstar's provision of mobile broadband services

Fourth No build out requirements imposed for terrestrial authority

Fifth Requires Globalstar to protect other licensed services from harmful interference

Sixth Proposes technical rules (power limits, OOBE rules) that strike an appropriate balance to protect other licensed and unlicensed interests

Seventh Proposes equipment certification rules to minimize the burdens on device manufacturers

The FCC has established a comment cycle of 75 days and 105 days after publication in the Federal Register for initial and reply comments, respectively

GLOBALSTAR VALUE DRIVERS

Operational Improvements & Low Cost Scalable Network

- With all second-gen satellites providing service, Globalstar has achieved full Duplex service restoration
- Debt refinancing provides financial flexibility and eliminates near-term financial uncertainty
- Second-gen provides considerable cost benefits and significant voice and data capacity (34 billion text messages or 19 million voice or data minutes per day)

New Products Expanding Addressable Market

- Successfully launched three products in 2013 including SPOT TraceTM ; three additional products to be launched over the coming quarters
- 10,000 retail points of distribution and over 2,000 dealers / resellers / VARs
- New products designed to expand addressable market through lower costs and enhanced functionality

Sales & Operational Momentum

- Continued momentum in revenue growth drivers
- Duplex MOUs increase 23% over the prior year period
- Duplex ARPU increased 29% over Q3 2012
- 10% increase in revenue over the prior year period

Valuable Spectrum Assets

- Non-replicable, globally-harmonized spectrum
- Unique spectrum position allows for rapid deployment of 22 MHz of 2.4 GHz spectrum for consumer broadband service to relieve existing Wi-Fi congestion
- FCC voted unanimously to release Globalstar's requested NPRM to provide a "Wi-Fi like" service

Leverage an inflection point into multiple, transformative opportunities

APPENDICES

APPENDIX 1: LETTER FROM PRESIDENT BUSH TO GSAT

THE WHITE HOUSE

WASHINGTON

November 21, 2005

Globalstar Telecommunications Limited
Milpitas, California

Dear Friends:

I learned about your contributions to help the victims of Hurricanes Katrina and Rita. Our Nation is grateful to all those who are helping their fellow citizens in need.

The scenes from the hurricanes have touched our hearts, and our Nation is again showing the world that the greatest challenges bring out the best in America. Together, we will continue to bring new hope to those affected by this tragedy, and the Gulf Coast will emerge better and stronger.

The good works of Globalstar demonstrate the character and great strength of our Nation. May God bless all those affected by these storms, and may God continue to bless America.

Sincerely,

George W. Bush

Globalstar

APPENDIX 2: LETTER FROM SENATOR LANDRIEU TO FCC

MARY L. LANDRIEU
LOUISIANA

United States Senate
WASHINGTON, DC 20510–1804

July 23, 2013

The Honorable Mignon Clyburn
Acting Chairwoman
Federal Communications Commission
Room 8-C445
Washington, DC 20554

Dear Acting Chairwoman Clyburn:

I respectfully request your attention to the situation with Globalstar, Inc. located in Covington, Louisiana. It is my understanding that the Federal Communications Commission (FCC) is currently reviewing a petition for rulemaking that would allow Globalstar to utilize its mobile satellite spectrum for terrestrial mobile broadband services.

It is a pleasure for me to inform you of my support for this petition. As you know, Hurricane Katrina and the subsequent Federal levee breaks devastated New Orleans. Satellite-based communications were vitally important when terrestrial communications networks became overloaded and failed after this disaster. After Katrina, Globalstar had over ten thousand satellite phones operating in the Gulf Coast region. As a result, I believe that allowing Globalstar the ability to continue providing these services well into the future will provide additional coverage and capacity in such post-disaster situations. In addition to these disaster-related benefits, I also note Globalstar's offer of 20,000 free terrestrial low-power service access points to schools, libraries and hospitals. Both of these objectives would benefit greatly from swift FCC action on Globalstar's petition.

I believe you will find the petition to be exemplary in every way, and I would appreciate that you give it every appropriate consideration, within the applicable guidelines, during the review. In closing, I ask for any information that you may now provide on this matter and look forward to hearing from you about the final decision. Should you have any questions, please contact me or my Policy Director, Brian van Hook, at (202) 224-2747.

With warmest regards, I am

Sincerely,

Mary L. Landrieu

Mary L. Landrieu
United States Senator

Cc: The Honorable Jessica Rosenworcel, Commissioner, FCC
The Honorable Ajit Pai, Commissioner, FCC

Globalstar

APPENDIX 3: LETTER FROM NYPA TO FCC

123 Main Street
White Plains, New York 10601
914 681.6200

New York Power Authority

May 20, 2013

Mignon Clyburn
Acting Chairwoman
Federal Communications Commission
445 Twelfth Street SW
Washington, DC 20554

Re: Globalstar Petition for Rulemaking; RM-11685

Dear Chairwoman Clyburn:

I am the Principal Communications Engineer for the New York Power Authority (NYPA), the country's largest state public power organization, producing some of the lowest cost electricity in the America. I write in support of the referenced petition for the FCC to consider Globalstar's request for a rulemaking to provide terrestrial services over its MSS spectrum.

We rely upon the services of various satellite-based communications companies including Globalstar to ensure that we are never out of communication capabilities regardless of when or where a natural or man-made disaster should strike. Recently, during and immediately after Hurricane Sandy, our only means of communication into or out of our facilities located on Long Island was via satellite, over Globalstar's network.

In addition to NYPA's reliance upon mobile satellite services, recent severe flooding has rendered most all terrestrial communication networks inoperable in the Blenheim-Gilboa community located south west of Albany. This is also the area of one of our major power plants. As a result, NYPA has encouraged wireless providers to enter and provide communications to the local community, essential services as well as local businesses. We understand that Crown Castle has recently constructed two towers in the area for the provision of potential mobile communications services. Yet, the area is still without much hope for restoration of communications service, near term. Globalstar's provision of access points to bring Wi-Fi like connectivity to this area would be greatly appreciated.

The Federal Communications Commission should begin a rulemaking to permit Globalstar to provide terrestrial services over its MSS spectrum, so that NYPA and all other Globalstar customers can receive mobile satellite services free-of-charge in federally declared disaster areas and perhaps provide a mobile satellite solution to the communications needs of communities such as Blenheim-Gilboa.

On behalf of NYPA, we look forward to the Federal Communications Commission commencing a rulemaking to bring these positive developments to our operating areas.

Sincerely,

Frank A. Miller

Globalstar

APPENDIX 4: FCC's Proposed Rule Changes to UNII-1 Band

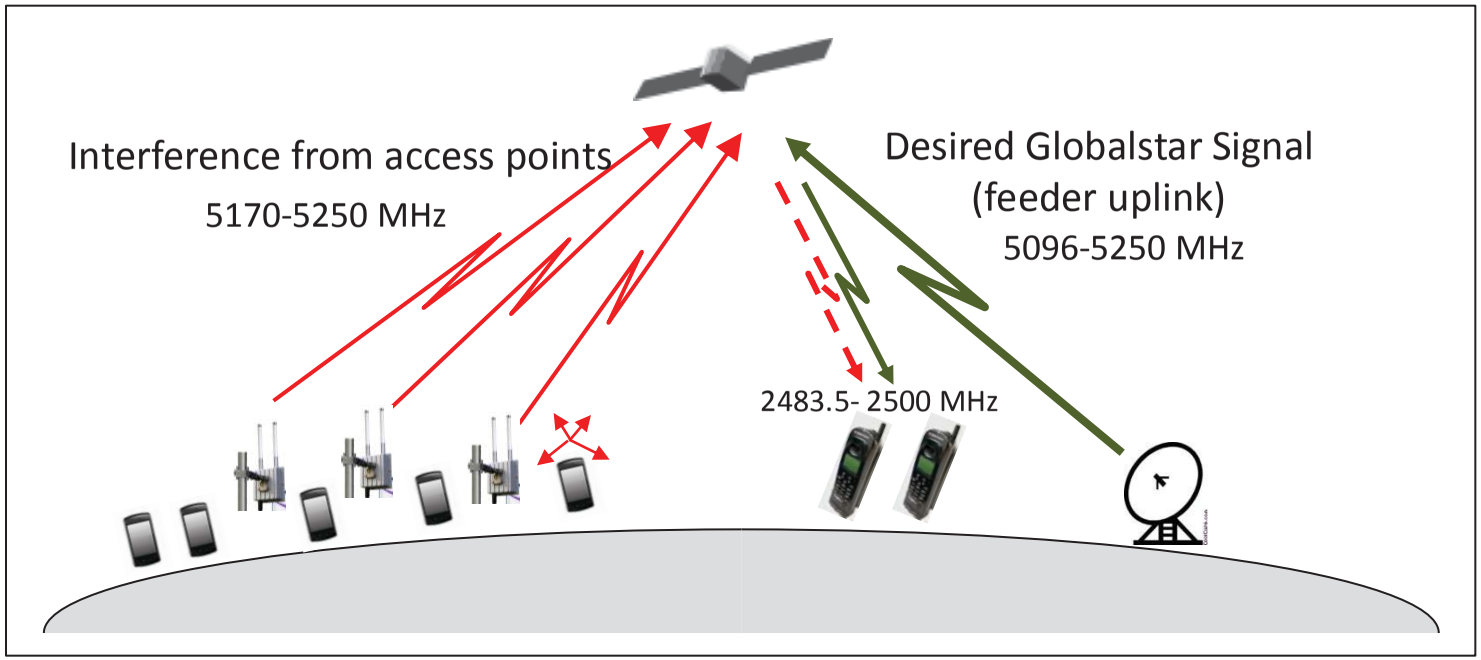
Globalstar has always shared its licensed 5 GHz spectrum with unlicensed UNII-1 access points operating at lower power indoors.

FCC is considering both a 5x increase in power and outdoor deployment of these devices.

All UNII-1 access points visible to satellite (within a 5800 km diameter on Earth's surface) create interference at satellite receiver.

Desired Signal-plus-Interference is Repeated on the Downlink.

Independent Engineering Analysis performed by Roberson and Associates confirms that planned deployment of millions of outdoor UNII-1 devices will have a "substantial detrimental impact" on Globalstar's mobile satellite service system.



APPENDIX 5: Iridium's Petition to Grab Globalstar Spectrum

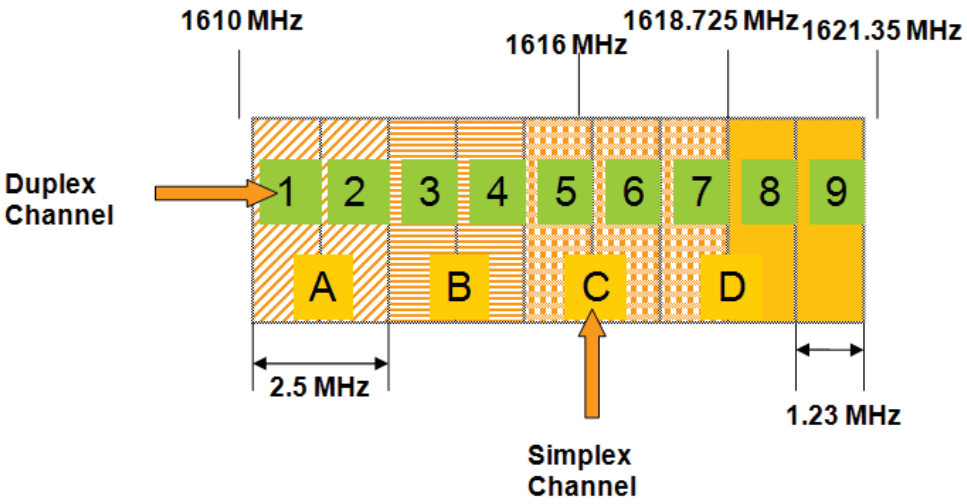
Iridium, Globalstar's primary competitor in the MSS market, has petitioned the FCC to take approximately 3 MHz of Globalstar's 1.6 GHz spectrum (1616-1618.725 MHz) and reallocate it to Iridium.

Globalstar's SPOT services rely upon this spectrum daily to initiate live-saving rescues around the world.

The FCC completed a multi-year review of the Big LEO band plan in 2007 and established the present division of 1.6 GHz spectrum between Globalstar and Iridium then.

Globalstar and its investors relied upon this decision and Globalstar's licensed spectrum allocation in deciding to spend the next 6 years and in excess of $1 billion to launch the world's first second generation LEO constellation of satellites.

Loss of this additional spectrum would have a disastrous effect on Globalstar's global MSS operations, causing significant harm to its customers, including government, enterprise and consumers who utilize Globalstar services in life threatening situations every day around the world.



Globalstar L-band Return Link Frequency Plan