Supplement ORBCOMM License Corp. FCC File No. 0086-EX-RR-2006 Call Sign WB2XGL

FCC Corresp. Ref No. 4441

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SUPPLEMENT

ORBCOMM License Corp. ("OLC") respectfully submits this Supplement to FCC Application File No. 0086-EX-RR-2006 (Renewal of FCC Call Sign WB2XGL). This Supplement is in response to a request for additional information from the Experimental Radio Branch regarding the need for continuing experimental operation throughout CONUS in connection with the requested authorization renewal. For the reasons stated below, there is ample justification to renew the authorization maintaining the full CONUS operating area. Accordingly, ORBCOMM requests that the renewal be granted without change of the previously authorized full CONUS operating area.

- There is No Possibility of Harmful Interference to Any Third Party. OLC's parent company ORBCOMM Inc. is the owner and operator of the ORBCOMM NVNG mobile satellite service system (FCC Call Sign S2103). The ORBCOMM System is the *only* operational commercial satellite system authorized by the FCC that utilizes the channels in the 137-138 MHz band on which the experimental equipment authorized under Call Sign WB2XGL operates. ORBCOMM's commercially authorized use of the subject channels (which are employed for satellite downlink operations) is exclusive in the United States, and is coordinated and notified internationally in accordance with ITU procedures. Accordingly, the experimental use of these frequencies for the subject terrestrial transmitter cannot cause harmful interference to any third party with interference protection rights.
- There are a Limited Number of Experimental Units. The equipment authorized under Call Sign WB2XGL for which experimental license renewal is requested consists of a developmental terrestrial transmitter that operates on ORBCOMM downlink channels in the 137-138 MHz band. This unit (sometimes referred as the "satellite on a stick") is capable of simulating the space segment transmit portion of an ORBCOMM subscriber link. It is being developed for several possible uses, including an indoor test device for new user terminal development, and a repeater for mobile units on vehicles that are stored in warehouses or other buildings, or are otherwise located in areas that lack satellite coverage. At any given time, there are no more than about ten of these units that are operationally capable.
- > Experimental Operation is of Limited Duration. Use of the devices covered by Call Sign WB2XGL is typically of very limited duration. No permanent installations or operations exist, or are contemplated during the proposed continuation of the experimental program.