

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)
)
ORBCOMM License Corp.) File No. 0465-EX-PL-2014
Application for New or Modified Radio)
Station Under Part 5 of FCC Rules –)
Experimental Radio Service (Other Than)
Broadcast))

OPPOSITION OF IRIDIUM CONSTELLATION LLC

Pursuant to Section 5.95 of the Commission’s rules,¹ Iridium Constellation LLC (“Iridium”) hereby submits its Opposition to the above-captioned experimental license application (the “Application”) of ORBCOMM License Corp. (“ORBCOMM”).² ORBCOMM requests a 24-month experimental license “to facilitate the development and field testing of a new simplex CDMA L-Band mobile earth station” that will utilize the simplex data service supported by the Globalstar NGSO system.³ The Application seeks to utilize four contiguous 2.5 MHz blocks of L-band spectrum, including a block at 1617.5-1620 MHz (“Block 4”), throughout the continental United States.⁴

ORBCOMM’s proposed use of Block 4 spectrum would violate the current Big LEO MSS band plan, which authorizes Iridium 7.775 MHz of exclusive-use L-band spectrum from 1618.725-1626.5 MHz and 0.95 MHz of shared L-band spectrum with Globalstar from

¹ 47 C.F.R. § 5.95.

² ORBCOMM License Corp., Application for New or Modified Radio Station Under Part 5 of FCC Rules – Experimental Radio Service (Other Than Broadcast), File No. 0465-EX-PL-2014 (submitted June 17, 2014) (“ORBCOMM Application”).

³ ORBCOMM Application, Narrative, at 1.

⁴ ORBCOMM Application.

1617.775-1618.725 MHz.⁵ The current Big LEO MSS band plan therefore clearly contradicts ORBCOMM's claim that "all radio frequency utilization under the proposed FCC Experimental License will be in full accordance with the technical parameters of existing FCC Blanket licensed simplex L-band channel assignments."⁶

ORBCOMM's mobile earth station seeks to use Globalstar L-Band CDMA uplink capacity to field test its mobile earth station. The other three blocks specified in the Application available for Globalstar devices, at 1610-1617.5 MHz (Blocks 1-3), should suffice for this purpose. Therefore, the Commission should deny the application, or, in the alternative, limit ORBCOMM's experimental license authority to Blocks 1-3.

Respectfully submitted,

Donna Bethea-Murphy
Vice President, Regulatory Engineering
Iridium Satellite LLC
1750 Tysons Boulevard
Suite 1400
McLean, VA 22102

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⁵ See *Spectrum and Service Rules for Ancillary Terrestrial Components in the 1.6/2.4 GHz Big LEO Bands*, 22 FCC Rcd 19733 (2007).

⁶ ORBCOMM Application, Narrative, at 1.