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UB Nanosatellite FCC File No. 1781-EX-ST-2016

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Tue, Feb 21, 2017 at 12:00 PM

To: Seamus Lombardo <s.lombardo31@gmail.com>

Cc: Carlos Flores <carlos.flores@fcc.gov>

Mr. Lombardo:

Please send a reply E-Mail to sonnenfeldt.walter@orbcomm.com to confirm that you have received this message.

Thank you for your E-Mail of 10 February 2017 providing information regarding the proposed special temporary experimental use of the 137-138 MHz and 436.15-437 MHz bands in relation to the pending UB Nanosatellite Laboratory ("UB") FCC Experimental Special Temporary Authority Application (File No. 1781-EX-ST-2016, the "Application").

ORBCOMM understands that the Application proposes FCC Rule Part 5 Experimental Special temporary authority use of one (1) channel, centered at 137.875 MHz, with a 12 kHz bandwidth (emissions designator 12K0F1D), and an EIRP of 10W (+40dBm). We also understand that UB's proposed single channel experimentation will be operating for a few hours with an average duty cycle under 20%, but potentially with periods of 100% activity lasting up to 10 minutes at a time, and only at the specific geographic locations identified in the Application.

Based on the information stated above, ORBCOMM has no objection to grant of the Application to permit UB to conduct its proposed program of experimentation on a non-protected non-interference basis using the proposed single above-described 137.875 MHz channel in accordance with Part 5 of the FCC's Rules. We also have no objection to the proposed Part 5 experimental use of the 436.1-437 MHz band proposed in the Application.

However, we must underscore that ORBCOMM's consent to temporary non-interference FCC Part 5 experimental use of spectrum in any frequency bands licensed for commercial use by ORBCOMM must in no way be construed as ORBCOMM's consent to coordination of shared use of spectrum under any other authorization regime.

ORBCOMM has no other comments or objections to the Application at this time.

Best Regards,

Walter Sonnenfeldt

Vice President, Regulatory Affairs

ORBCOMM Inc.

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