



February 28, 2014

**VIA ELECTRONIC MAIL**

Ms. Jennifer Warnell  
MET Laboratories, Inc.  
914 West Patapsco Avenue  
Baltimore, Maryland 21230

**Re: FCC Equipment Authorization ID No. UQR-CMDCSTM3**

**Request for FCC TCB Assistance to Reissue FCC Equipment Authorization ID No. UQR-CMDCSTM3 under Grantee Code XGS as 'XGS-ORBCSTM3'**

Dear Ms. Warnell:

Following up on our February 4, 2013, telephone conversation, we request the FCC TCB assistance of MET Laboratories, Inc. ("Metlabs") in the reissuance of FCC Equipment Authorization ID No. UQR-CMDCSTM3 under ORBCOMM License Corp. Grantee Code XGS as 'XGS-ORBCSTM3'.

As we discussed, this reissuance is in connection with an asset purchase transaction completed on October 1, 2013, pursuant to which ORBCOMM Inc. (the parent company of ORBCOMM License Corp.) acquired various assets associated with Comtech Mobile Datacom Corporation's Sensor Enabled Notification System ("SENS") business operation. These assets included all property rights associated with the satellite terminal equipment covered by FCC Equipment Authorization ID Nos. XGS-601490 and UQR-CMDCSTM3. For your reference, Attachment A to this letter is a copy of the November 29, 2013, joint ORBCOMM and Comtech letter (the "Notification"), notifying the FCC OET Equipment Authorization & Compliance Branch of the transaction and transfer of ownership of the two above-mentioned FCC Equipment Authorizations.

Following submission of the Notification, the FCC OET Equipment Authorization & Compliance Branch transferred Grantee Code XGS to ORBCOMM License Corp. as per ORBCOMM's request. To complete the process, we now need to have FCC Equipment Authorization ID No. UQR-CMDCSTM3 re-issued as 'XGS-ORBCSTM3'.

We understand that, acting in its capacity as and FCC TCB, Metlabs can complete the reissuance for a fee in the amount of \$250. Please send me the invoice for the reissuance to my attention, with a copy via E-Mail.



**Ms. Jennifer Warnell**  
**MET Laboratories, Inc.**  
**February 28, 2014**  
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**2.929(d) Transferor Certification.** This is to confirm to Metlabs that, in accordance with Section 2.929(d) of the Commission's Rules, 47 C.F.R. §2.929(d), as stated in the signed Certification included at Attachment 1 of the Notification, ORBCOMM has agreed to assume all applicable FCC compliance obligations associated with the issuance of an FCC Equipment Authorization Grantee Code and FCC Equipment Authorizations for the satellite terminal equipment currently covered by FCC Equipment Authorizations UQR-CMDCSTM3 & XGS-601490.

Thank you for your prompt attention to this matter. If you have any questions, or if you need any additional information, please contact me.

Very truly yours,



Walter H. Sonnenfeldt  
Vice President, Regulatory Affairs  
ORBCOMM Inc. &  
Regulatory Affairs Manager,  
ORBCOMM License Corp.  
Direct Tel: 585 461 3018  
E-Mail: [sonnenfeldt.walter@orbcomm.com](mailto:sonnenfeldt.walter@orbcomm.com)

**Encl:** Attachment A - November 29, 2013, Notification of Change in Ownership

November 29, 2013

**VIA FCC OET EAS**

Mark Neumann, Chief  
Equipment Authorization & Compliance Branch  
Office of Engineering and Technology  
Federal Communications Commission  
FCC Laboratory  
7435 Oakland Mills Road  
Columbia, Maryland 21046

**Re: FCC Equipment Authorization ID No. UQR-CMDCSTM3  
FCC Equipment Authorization ID No. XGS-601490**

**Notification of Change in Ownership**

**Request to Transfer Above-Referenced FCC IDs to  
ORBCOMM License Corp.**

Dear Mr. Neumann:

Pursuant to Section 2.929(d) of the Commission's Rules, 47 C.F.R. §2.929(d), FCC Equipment Authorization Grantees Comtech Mobile Datacom Corporation (FCC Grantee Code 'UQR') and Comtech AeroAstro, Inc. (FCC Grantee Code 'XGS'), together with ORBCOMM Inc. and ORBCOMM License Corp., hereby notify the Commission of the October 1, 2013, transfer of ownership of the above-referenced FCC Equipment Authorizations to ORBCOMM Inc. As set forth below, ORBCOMM Inc. respectfully requests that the above-referenced FCC Equipment Authorizations be transferred to its wholly-owned subsidiary company, ORBCOMM License Corp.

**Description of the Asset Purchase Transaction.** By an asset purchase transaction completed on October 1, 2013 (the "Transaction"), ORBCOMM Inc. acquired various assets associated with Comtech Mobile Datacom Corporation's Sensor Enabled Notification System ("SENS") business operation. These assets included all property rights associated with the satellite terminal equipment covered by the above-referenced FCC Equipment Authorizations.

**Affected Equipment Authorizations.** The Transaction entails the transfer of a total of two (2) FCC Equipment Authorizations. These include: (a) one of two FCC Equipment Authorizations issued to Comtech Mobile Datacom Corporation under FCC Grantee Code 'UQR' (*i.e.*, UQR-CMDCSTM3, but not UQR-CMDCMTM203); and (b) the only

**Mark Neumann, Chief  
Equipment Authorization & Compliance Branch  
Office of Engineering and Technology  
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FCC Equipment Authorization issued to Comtech AeroAstro, Inc. under FCC Grantee Code 'XGS' (*i.e.*, XGS-601490).

**About ORBCOMM.** ORBCOMM Inc., a publicly-traded corporation organized under the laws of the state of Delaware, is the owner and operator of the ORBCOMM non-geostationary mobile satellite service system (the "ORBCOMM System"). ORBCOMM is a worldwide provider of Machine-to-Machine ("M2M") data communications solutions utilizing various networks and delivery platforms. ORBCOMM Inc. wholly-owned subsidiary ORBCOMM License Corp., a Delaware corporation, is the holder of the FCC space segment and ground segment licenses for the ORBCOMM System. As such, ORBCOMM is quite familiar with the Commission's Rules and policies relating to satellite communications and satellite equipment. As set forth in the attached Certificate, ORBCOMM stands ready to assume responsibility for the continued FCC Rule compliance of equipment marketed under the above-referenced FCC Equipment Authorizations.

**ORBCOMM designation of Grantee Transferee.** Purchaser ORBCOMM Inc. respectfully requests that the Commission transfer the above-referenced FCC Equipment Authorizations to its wholly-owned subsidiary company, ORBCOMM License Corp.

**Suggested Alternatives For Transfer of the Equipment Authorizations.**

ORBCOMM suggests two possible alternatives to accomplish the transfer of the above-referenced FCC Equipment Authorizations: (1) transfer FCC Grantee Code 'XGS' to ORBCOMM License Corp., and re-issue UQR-CMDCSTM3 under Grantee Code 'XGS'; or (2) instruct ORBCOMM License Corp. to obtain a new FCC Grantee Code, and re-issue both UQR-CMDCSTM3 and XGS-601490 under the new Grantee Code.

\* \* \* \*

**Mark Neumann, Chief  
Equipment Authorization & Compliance Branch  
Office of Engineering and Technology  
Federal Communications Commission  
November 29, 2013  
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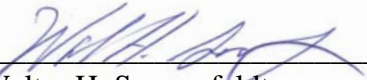
Kindly direct any inquiries concerning this submission to the undersigned.

Respectfully submitted,

**Comtech Mobile Datacom Corporation**

By:   
Ben Clark, Contracts Manager


**ORBCOMM Inc.**

By:   
Walter H. Sonnenfeldt  
Vice President, Regulatory Affairs

**Comtech AeroAstro, Inc.**

By:   
Ben Clark, Contracts Manager

**ORBCOMM License Corp.**

By:   
Walter H. Sonnenfeldt  
Regulatory Affairs Manager

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Encl: Attachment 1 Certificate of ORBCOMM

**CERTIFICATION**

I, Walter H. Sonnenfeldt, certify under penalty of perjury that:

In my capacity as Vice President, Regulatory Affairs for ORBCOMM Inc., and Regulatory Affairs Manager for ORBCOMM License Corp. (collectively, the “Company”), I have overall responsibility for advising the Company regarding compliance with the Rules and Policies of the Federal Communications Commission (“FCC”). To the best of my knowledge and belief, the Company is prepared and qualified to assume all applicable FCC compliance obligations associated with the issuance of an FCC Equipment Authorization Grantee Code and FCC Equipment Authorizations for the satellite terminal equipment currently covered by FCC Equipment Authorizations UQR-CMDCSTM3 & XGS-601490.

  
Walter H. Sonnenfeldt

Dated: November 29, 2013