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February 28, 1990

Ms. Donna R. Searcy
Secretary
Federal Communications Commission
Room 222
1919 M Street, N.W.
Washington, D.C. 20554

Re: Proposed Low-Orbit Satellite System

Dear Ms. Searcy:

In the attached Application for Authority to Construct a Low-Orbit Mobile Satellite System, Orbital Communications Corporation ("ORBCOMM") is seeking authority to construct 22 small satellites for use in a low-earth orbit satellite system. By operating 20 small satellites 600 miles above the earth's surface (compared to 22,300 miles for a geosynchronous satellite), the ORBCOMM system will allow for low-power, low-cost portable subscriber terminals that will enable ORBCOMM to meet unserved and underserved communications needs. Advances in launch vehicles and small satellite technology make this innovative commercial low-earth satellite system practical for the first time. ORBCOMM will offer position determination (using the Doppler characteristics of low-earth orbit satellites) and low-speed, two-way data (i.e., non-voice) service for use in emergency communications (including the capability to meet the needs identified by the Commission in the PELTS proceeding), data acquisition, tracking and messaging.

22-DSS-P-90
S 2103

RECEIVED

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REGISTRATION

- * NOT ADMITTED IN DC
- * ADMITTED IN VIRGINIA
- * ADMITTED IN TEXAS

Ms. Donna R. Searcy
February 28, 1990
Page 2

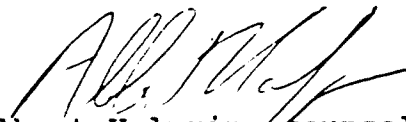
The use of low-earth orbit satellites will provide virtually continuous coverage throughout the United States as the satellites constantly move relative to the earth's surface; in addition, the same satellites will cover the rest of the world, allowing global coverage with only the addition of earth stations in other parts of the world. This global coverage will allow ORBCOMM to export service, and thereby reduce the telecommunications foreign trade deficit.

The Commission must act quickly, however, if the U.S. is to take advantage of its current technological lead in this new mobile service, because other nations are working on similar launch vehicle and small satellite technologies. In order to speed implementation, ORBCOMM is concurrently filing a petition for rulemaking and a request for waiver of the construction permits under Section 319(d),^{1/} and requests that the Commission act on all of ORBCOMM's filings expeditiously. As demonstrated in the petition for rulemaking and application to construct, the public interest would be well served by Commission authorization of ORBCOMM's pioneering, low-earth orbit satellite service.

In accordance with Section 1.1105 of the Commission's Rules, a check in the amount of \$39,600 is attached (\$1,800 for each of 22 satellite construction applications) to cover the filing fees. In addition, a check in the amount of \$90 is attached to cover the filing fee for the 319(d) waiver request.

ORBCOMM has sought to provide the Commission with all the information relevant to its application. Should you have any questions concerning this filing, please contact the undersigned or Mr. Alan Parker at (703) 631-3600.

Sincerely,



Albert Halprin, Counsel for
Orbital Communications Corporation

^{1/} ORBCOMM is also filing a request to keep a small amount of information in its application confidential for a limited period of time. That information has been segregated, and is being submitted to the Commission separately.