

National Panasonic

Kyushu Matsushita Electric Co., Ltd.

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June 17, 1991

Ms. Donna R. Searcy, Secretary
Office of the Secretary
Federal Communications Commission
Room 222
1919 M Street, N.W.
Washington, DC 20054

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DOMESTIC FACILITIES DIVISION
SATELLITE RADIO BRANCH

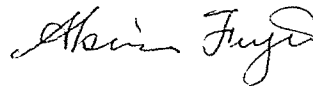
RE: Comments of Kyushu Matsushita Electric
File No. 22-DSS-MP-90(20)

Dear Ms. Searcy,

Attached are the Comments of Kyushu Matsushita Electric concerning Orbital Communication Corporation's Amended Application for authority to construct a low-orbit mobile satellite system.

An original and five (5) copies of the Comments are provided.

Sincerely,



Akira Fujio
Executive Vice President
Kyushu Matsushita Electric Co., LTD.

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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In the Matter of Amended Application of

JUN 12 1991

ORBITAL COMMUNICATIONS CORPORATION)

) FCC MAIL BRANCH

For Authority to)

File No. 22-DSS-MP-90(20)

Construct a Low-Orbit Mobile)

Satellite System)

COMMENTS

I. Background and Statement of Interest

Established as a subsidiary of Matsushita Electric Industrial Co., Ltd. in 1955, Kyushu Matsushita Electric Co., Ltd. has grown to become one of Japan's premier electronics manufacturers, with operations presently centered on four fields: office automation, factory automation, telecommunications, and magnetic recording components. Presently, the Telecommunications, Office Automation and Visual Equipment Products Group manufactures a wide range of merchandise, including information and communications equipment for overseas markets such as telephone answering machines, cordless telephones, telephone answering machines with facsimile capabilities, and PBXs. This Group also produces word processors, desktop publishing equipment, laser printers, dot matrix printers, and electronic typewriters.

In the Electronic Components Group, the company manufactures magnetic heads, electronic components for color televisions, integrated circuits. The Electric and Electronic Equipment Products Group produces Factory Automation Equipment including Chip mounters, small precision motors, and water treatment equipment.

Kyushu Matsushita and its affiliates have factories throughout the Kyushu region of Japan, which has contributed immensely to regional economic development and new employment opportunities. Overseas, Kyushu Matsushita has established production subsidiaries in the United Kingdom and Malaysia. The company provides technological assistance to the People's Republic of China for a wide range of television components and produces home water pumps in Indonesia. Other overseas activities include providing various type of technological assistance to the Philippines, Brazil and India.

Presently, Kyushu Matsushita employs 11,000 peoples worldwide, and in 1990 had sales totaling \$2.3 billion.

Kyushu Matsushita's business is expanding rapidly in the area of mobile communications, one of the fastest growing segments of the global communications industry. This growth has been driven by worldwide interest in cellular radio, paging, and other mobile voice and data systems. Yet there

remains an unmet requirement for low-cost, two-way communications to and from areas out of reach of these systems. Terrestrial and geostationary satellite systems cannot practically or economically serve the needs of mobile users who may need a stand-by capability to call for help or to send or collect critical information from a remotely located terminal. These unserved and undeserved applications may be met by the ORBCOMM system on a worldwide basis and at user costs for equipment and terminal equipment attractive to a large market.

II. Comments

Kyushu Matsushita has investigated potential markets for the ORBCOMM low-Earth orbit communications system and believes that there is a significant requirement for two-way data and position determination services using VHF frequencies. Studies also show that ORBCOMM services cannot be provided practically by any other system. The services include emergency services, data acquisition, monitoring and messaging. Existing and planned system such as cellular radio, paging, SMR and higher frequency mobile satellite systems have major shortcomings compared with ORBCOMM in either geographic coverage or cost or both. ORBCOMM's comparative advantage is based on its ubiquitous geographic coverage coupled with the potential to operate with

subscriber equipment priced at levels attractive to consumers. Also, ORBCOMM's narrow-band communications system and the large constellation of satellites appears to provide the high grade of service availability and reliability required for the planned services.

In view of the important new, and potentially life saving, communications services proposed by ORBCOMM, Kyushu Matsushita encourages the Commission to act expeditiously to allocate spectrum and, in parallel, to process the ORBCOMM application for construction. Also, it is our understanding that ORBCOMM has asked the Commission to grant a "pioneer's preference" to ORBCOMM at the time the Rulemaking procedure is initiated. We urge the Commission to favorably consider ORBCOMM's request for "pioneer" status as a means of accelerating availability of the new service both in the U.S. and throughout the world.

Kyushu Matsushita's Position supporting the ORBCOMM proposal is based on several factors:

1. Subscriber Terminal Cost Projections - Kyushu Matsushita has completed a review of terminal design alternatives and manufacturing cost and believes that consumer level pricing can be achieved at the high manufacturing volumes projected by ORBCOMM. The company is interested in becoming a major manufacturer of ORBCOMM subscriber equipment.

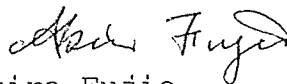
2. ORBCOMM FDMA communications System - ORBCOMM's FDMA approach appears to be superior to the CDMA alternative considering the likelihood that CDMA will be jammed by existing fixed and mobile users of the uplink band at 148-149.9MHz. ORBCOMM's FDMA approach will provide significant advantage over CDMA including a higher grade of service and lower subscriber terminal unit cost.
3. ORBCOMM's System and Services Are Innovative - ORBCOMM was the first to propose use of the low-Earth orbit to provide a full-time, two-way data communications and position determination system at affordable prices. The system is based on technical, economic and market concept breakthroughs derived from use of the Pegasus launch vehicle and VHF frequencies.
4. ORBCOMM Can Provide Service Worldwide - As a company that manufactures and distributes its products throughout the world, Kyushu Matsushita is fully familiar with the availability or lack of communications services. ORBCOMM offers the potential to make basic communications available in large areas of the world where communications are non-existent or unaffordable. Thus, ORBCOMM may provide in less developed countries both an emergency communications system and a means to improve commercial activity.

In view of these substantial benefits, Kyusyu Matsushita encourages the Commission to allocate spectrum to the low-orbit mobile satellite service and to move quickly to license ORBCOMM in the U.S. Kyushu Matsushita will support international allocations to the service at WARC-92.

III. Summary

Kyushu Matsushita is one of the world's foremost manufacturers of office and factory automation and telecommunications equipment. The company has studied the ORBCOMM business and technical proposals and has concluded that ORBCOMM has the potential to provide a wide range of innovative, reliable and low cost communications and position determination services. Because these new services include emergency communications, the Commission is urged to proceed expeditiously to initiate a Rulemaking proceeding and to License ORBCOMM to construct the system without delay.

Respectfully submitted,



Akira Fujio
Executive Vice President
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1-62 4-Chome, Minoshima, Hakata-Ku
Fukuoka 812, Japan

June 17, 1991