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Federal Communications Commission
Office of the Secretary

MAY 18 1990

Domestic Facilities Division
Satellite Radio Branch

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

In the Matter of the Application of)	
ORBITAL COMMUNICATIONS CORPORATION)	File No.22-DSS-MP-90(20)
For Authority to Construct a Low-)	
Orbit Mobile Satellite System)	

COMMENTS

Communications Satellite Corporation, through its World Systems Division ("COMSAT"), hereby submits comments on the above-referenced "Application" filed by Orbital Communications Corporation ("ORBCOMM").

ORBCOMM proposes to construct, launch and operate a system of 20 satellites placed in circular orbits approximately 970 kilometers (600 statute miles) above the earth. Two satellites are proposed to be placed in polar orbits, and 18 in 40-degree inclined orbits. The system is proposed to provide two-way data communications and position determination services primarily to mobile subscribers throughout the 50 states, Puerto Rico, the Virgin Islands, and the U.S. Pacific Islands plus the polar regions of the earth. The system also is inherently capable of providing international service throughout the rest of the world.

COMSAT does not oppose the subject Application, but submits that the United States is required to consult ORBCOMM's proposed system under Article 14(d) of the INTELSAT Agreement and, to the extent maritime services are provided, notify INMARSAT under Article 8 of the INMARSAT Convention. Further, to the extent that ORBCOMM provides international communications services, we submit that ORBCOMM's system operations would be subject to the same policies and conditions as apply to U.S. separate systems. Separate Systems, 1 FCC Rcd 439 (1986); Separate Systems, 61 RR 2d 649 (Reconsideration Order)(1986); Separate Systems, 101 FCC 2d 1046 (1985);

COMSAT therefore respectfully requests that the Commission condition its grant of ORBCOMM's Application on prior compliance of the above.

Respectfully submitted
COMMUNICATIONS SATELLITE CORPORATION
World Systems Division

By Linda M. Wellstein
Linda M. Wellstein

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Its Attorney

May 14, 1990

CERTIFICATE OF SERVICE

I, Sandra Hunt, do hereby certify that a copy of the foregoing Comments was served by Hand, this 14th day of May, 1990, on the following:

Alan L. Parker
President
Orbital Communications Corporation
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Sandra Hunt

CERTIFICATE OF SERVICE

I, Katharine K. Bryant, do hereby certify that a copy of the foregoing "Petition to Deny Subject to Amendment to Application" was mailed, United States first-class postage prepaid, this 14th day of May 1990, to the following:

Albert Halprin, Esq.
Stephen L. Goodman, Esq.
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Katharine K. Bryant