

Mitsubishi Corporation

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

Federal Communications Commission
Office of the Secretary
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Domestic Facilities Division
Satellite Radio Branch

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

I. Background and Statement of Interest

A. Mitsubishi Corporation (MC) is a sogoshosha (general trading company) engaged in a wide range of business activities, including planning, marketing, consulting, financing, investing and trading. With headquarters in Tokyo, Japan, MC has 160 offices worldwide (including 104 major offices outside Japan). Employees number approximately 14,000. Gross annual transactions (sales) exceed \$115 billion, with net income of \$350 million. MC was instrumental in establishing a commercial satellite communications company in Japan, Space Communications Corporation (SCC), and currently maintains a 26.5% ownership share. MC also has an ownership position in a number of non-satellite based Japanese communications companies.

B. MC's unique position of operating on a global scale provides it with insights to communication needs throughout the world. Existing communication satellite systems, exemplified by the INTELSAT system, have done a great deal to make national and international communication networks a reality. These systems have concentrated on applications requiring high transmission rates (primarily voice and video transmissions), while not directly addressing important communication needs for applications requiring only low transmission rates (infrequent, low speed data transmissions). There is a critical need for such systems; particularly those which can be offered at low costs to users throughout the world.

The services proposed by ORBCOMM will augment existing services, while opening up satellite communications to numerous new and innovative services. MC anticipates worldwide usage of ORBCOMM Services for:

- emergency services
- data acquisition

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- tracking
- messaging

The Application, as well as ORBCOMM's Petition, provide a detailed description of these services. To MC a point of primary importance about the anticipated services is that it opens up the possibility for major breakthroughs in new and innovative services to be offered which have the potential to save lives, to help improve the environment, and to improve business efficiency.

- C. MC anticipates that opportunities for ORBCOMM will exist in developing countries, as well as the industrialized world, to improve communications capabilities and looks forward to exploring those opportunities with ORBCOMM. While this is a business opportunity, it will allow MC to further one of its three founding principles, that of "corporate responsibility to society."

II. Comments

- A. The primary strength of ORBCOMM's system is that the low cost to users (individual, regional, national or international) makes wide spread implementation possible throughout the world. Low cost service is made possible by using a low earth orbit satellite constellation which uses VHF and UHF bandwidth. This minimizes the cost of the space segment and allows the use of low cost, small, and highly portable transmitters/receivers. MC supports both the Petition and Application and respectfully urges the Commission to expeditiously approve them so that the process of worldwide implementation can proceed as soon as possible.
- MC, which is a Japanese company, may not seem a likely candidate to comment on a U.S. domestic Petition and Application before the Commission. However, our experience in the telecommunications industry, our global network of offices and global interests has made us fully appreciate the critical value of timely and accurate communications. The proposed services will fill an important gap in existing communication services, making feasible a new range of communication services worldwide.
- B. At the present time MC is not in a position to provide an assessment of specific markets in which it anticipates usage of the proposed services. However, it is safe to state that in Japan, as well as other parts of the world, there is potential for significant usage of the proposed services in all of the targeted market segments. Within Japan emergency services (particularly in consideration of the number of natural disasters which strike Japan and in consideration of some 10,344 lives lost in 1989 alone due to automobile accidents and 171 lives in winter mountains unable to identify their locations in time; all of these lives could have been saved if ORBCOMM system were available), tracking (primarily location of in-transit shipments) and messaging seem

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to have the greatest near term potential, assuming that the service can be provided at targeted costs and meet performance goals. In other parts of the world usage patterns may vary, based on differing geography, level of development and communication needs.

- C. MC is not aware of any other service provider which can offer the wide range of services at such low costs as ORBCOMM proposes to provide. It is this combination of the range of services at such low cost that holds the potential to revolutionize low-speed, infrequent data communications. Others will provide upgraded services in selected areas, but at the penalty of higher costs. Similarly, there are low cost service providers, but both the service areas and product lines are limited.

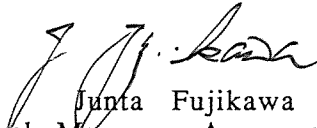
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III. Summary

MC supports the Petition and Application and respectfully urges the Commission to expeditiously approve them because of the great potential the proposed services have throughout the world. This opportunity should not be delayed.

Respectfully submitted,

MITSUBISHI CORPORATION



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May 14, 1990