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

Federal Communications Commission  
Office of the Secretary

In the Matter of the Application of

ORBITAL COMMUNICATIONS CORPORATION )  
)  
For Authority to )  
Construct a Low-Orbit Mobile )  
Satellite System )

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

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Domestic Facilities Division  
Satellite Radio Branch

REPLY COMMENTS OF FORD MOTOR COMPANY  
Electronics Division

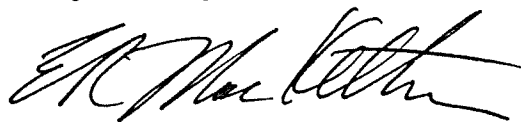
Ford Motor Company's Electronics Division (ELD) is a major manufacturer of high volume, high quality Automotive Electronics for a wide range of automotive components, including powertrain, audio, vehicle control and instrumentation products. In 1989, the Electronics Division manufactured in excess of ten million electronic devices for Ford Motor Company vehicles and light trucks.

In the past six months, ELD has investigated with Orbital Sciences Corporation (OSC) potential automotive applications for ORBCOMM communications services for which Orbital Communications Corporation submitted a petition for rulemaking and an application to construct on February 28, 1990. The Emergency Position Location and Messaging Service capabilities and the associated low costs described by ORBCOMM are of interest to Ford Motor Company. The operational communications system promises to address the needs of persons in need of assistance of some kind who lack access to a telephone. The availability of these services for automotive applications, we believe, could provide the automotive customer with the benefits of an additional element of in vehicle security.

ELD has cooperated with OSC in preliminary evaluations of the performance requirements and operating characteristics for the ORBCOMM system as applied to automotive products. As a part of this effort, a design for the basic single channel transmit and single channel receive communications unit and a manufacturing cost assessment was completed assuming high volume processing. In the study, circuitry required for position determination using one and two receive channels was analyzed on an incremental basis. Preliminary indications support ORBCOMM's conclusion that the subscriber equipment can be manufactured and distributed at the retail prices discussed in the petition, and in so doing, may appeal to mass consumer markets. Should further research confirm that the performance projections and costs are in line with expectations, Ford Motor Company may be interested in becoming a subscriber for an operational system serving the U.S. and potential overseas markets.

Ford Motor Company's Electronics Division supports ORBCOMM's request for authority to construct the system and asks the commission to act expeditiously regarding the licensing process and to authorize ORBCOMM to construct, launch and operate the system in the U.S. The commission is asked to authorize construction immediately following completion of the rule making process and without the delays associated with comparative processes that would postpone and possibly jeopardize availability of the service.

Respectfully submitted,



Edwin R. MacKethan

Date Submitted: May 14, 1990  
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