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C. ITOH AVIATION, INC.

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FCC MAIL SECTION  
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Domestic Facilities Division  
Satellite Radio Branch

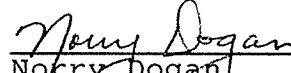
Ms. Donna R. Searcy, Secretary  
Office of the Secretary  
Federal Communications Commission  
Room 222  
1919 M Street, N.W.  
Washington, D.C. 20554

Re: Comments of C. Itoh Aviation, Inc.  
File No. 22-DSS-MP-90(20)

Dear Ms. Searcy,

Attached are the Comments of C. Itoh Aviation, Inc., concerning Orbital Communications Corporation's (ORBCOMM) Application for authority to construct a low-orbit mobile satellite system. An original and one copy of the Comments are provided.

Sincerely,

  
\_\_\_\_\_  
Nofry Dogan  
Eastern Regional Manager

cc. Mr. Alan L. Parker, President, ORBCOMM

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

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

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Domestic Facilities Division  
Satellite Radio Branch

In the Matter of the Application of  
ORBITAL COMMUNICATIONS CORPORATION )  
 )  
For Authority to )  
Construct a Low-Orbit Mobile )  
Satellite System )

COMMENTS

C. Itoh Aviation, Inc., is a 100% wholly-owned subsidiary of C. Itoh & Co., (America) Inc., which in turn is a 100% wholly-owned subsidiary of C. Itoh & Co., Ltd., located in Tokyo, Japan. C. Itoh & Co., Ltd., had a worldwide trading volume in 1986 of approximately \$101,216,000,000 and a worldwide employee body of over 10,000 employees. C. Itoh Aviation, Inc., belongs to the Aerospace and Electronics Group of C. Itoh & Co., Ltd., which also has responsibility for C. Itoh's satellite communications business.


C. Itoh has a number of subsidiaries within Japan that provide satellite communication services to a broad range of customers and has interests in mobile communication corporations around the world. C. Itoh's services cover the full range of data, voice, and video services. The ORBCOMM service may enable C. Itoh to provide the potentially life saving services, that are explained in ORBCOMM's application, to the Japanese automobile users. ORBCOMM's services are unique in that they provide both an economical and effective low power service that most Japanese automobile users will probably

not want to do without. Also, C. Itoh may be able to extend or promote the same services to other countries who are lacking in this form of service.

We urge the Commission to expedite the licensing process for ORBCOMM's Application for these potentially life-saving services. We also hope that the Commission authorizes construction soon following completion of the Rulemaking process so as not to postpone unnecessarily the establishment of these services.

In summary, I just wish to reiterate C. Itoh Aviation's support of ORBCOMM's Application and the benefit such service will have not only for the USA but also for Japan and the world.

Respectfully submitted,

  
Norry Dogan  
Eastern Regional Manager  
C. Itoh Aviation, Inc.  
335 Madison Avenue  
New York, NY 10017  
(212) 818-8482

Date Submitted: May 14, 1990