

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

FCC MAIL SECTION

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In the Matter of Amended Application of

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

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

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DOMESTIC AND FOREIGN COMMUNICATIONS
SATELLITE SERVICE DIVISION

COMMENTS

I. Background and Statement of Interest

Sea-Land Service is this country's largest containership operator; we provide container shipping service to and operate in over 70 countries. Our assets include 8500 employees, 64 vessels and 140,000 freight containers. In a typical operating quarter we will carry over 266,000 container loads and generate operating income in excess of \$21 million.

One of the problems unique to a capital intensive, worldwide operation like ours is control of our rolling stock (containers, generator sets, etc.). Effective utilization of these assets demands a real time system of control that can provide location information and, for certain equipment, operating parameters such as temperature and fuel levels. Currently available systems cannot cost effectively provide what is needed.

II. Comments

Sea-Land supports ORBCOMM's request for authority to construct their system. We urge the Commission to act to expedite the rulemaking and licensing processes so that this service can be available without delay. We further urge the Commission to authorize construction immediately, without the delays normally associated with the Commission's comparative processes. There is an immediate, worldwide need for systems such as ORBCOMM's.

The initial application Sea-Land projects for the ORBCOMM system is the tracking and operational monitoring of our 50 KW rail car generator sets. These units operate unattended, providing power to refrigerated containers that are being used to transport perishable commodities across the United States. A generator set failure can lead to several million dollars in damage claims that we would have to pay. Currently available services to periodically (at way stops on the transcontinental rail voyage) check these generators for proper operation are unreliable. Currently offered satellite tracking and monitoring services are unproven and prohibitively expensive. We see ORBCOMM's proposed services as potentially reliable and affordable and as technically capable of fulfilling our needs.

III. Summary

There is an immediate need for a real time, cost effective asset tracking and monitoring system. It appears ORBCOMM's FMDA approach can fully meet our functionality, reliability and (low) cost requirements, being better suited to our applications than CDMA. Your expeditious, favorable handling of their amended application is requested.

Respectfully submitted,



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