

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

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JUN 17 1991

DOMESTIC FACILITIES DIVISION
SATELLITE RADIO BRANCH

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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COMMENTS

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I. Background and Statement of Interest

International Marine Industries, Inc. (IMI) is one of the world's largest suppliers of hardware and electronics to the yacht and boating industry. The company manufactures and markets spars, hatches, radars, LORAN, GPS and VHF marine radio equipment through a network of wholesalers and retailers in the United States and most foreign countries. Projected revenues for IMI are expected to exceed \$100 million dollars in 1991. IMI is part of International Marine Holdings, Inc. which has total revenues in excess of \$250 million dollars.

As a company concerned with making boating more enjoyable and safer, IMI is acutely aware of the need for improved communications throughout the world. With the exception of high priced INMARSAT and HF radio equipment, there is no high grade, reliable and affordable means to communicate emergency and other critical messages when out of line-of-sight to shore facilities. Also, there is a need for a very low cost way for stranded boaters to determine their position and to transmit that position to rescue authorities. Recently we became aware of the ORBCOMM low-Earth

orbit satellite system proposal and are convinced that ORBCOMM can fill an important void in emergency and critical messaging services in marine applications and can do so in a very cost effective manner.

II. Comments

In view of the potential of ORBCOMM to provide significant improvements in marine safety and communications at affordable user costs worldwide, the Commission is urged to act now to authorize construction of the system for service to the U.S. and to aggressively seek global allocations to the LEO MSS service below 1 GHz at the 1992 World Administrative Radio Conference. Such action will provide for U.S. leadership in this new and innovative technology and will lay the framework for substantial export opportunities.

Marine pleasure boaters presently have available a range of communications and position determination options. For communications, boaters use push-to-talk marine VHF radios, cellular phones or SSB radios. Some larger craft use INMARSAT terminals. For position determination, depending on the need for accuracy, boaters may choose LORAN, Transit and now GPS on-board terminals. All of these choices, however, have some shortcomings in the form of limited area of coverage, high price, large and unwieldy antennas or a combination thereof. By contrast ORBCOMM promises to eliminate these deficiencies as follows:

- . Coverage Area - the constellation of ORBCOMM satellites will offer universal worldwide coverage with no holes.

This addresses a serious deficiency of other systems.

. Grade of Service and Reliability - ORBCOMM will offer higher availability and subscriber access than most other systems and clear superiority when costs are considered.

. Affordable - ORBCOMM stand-alone communications and position determination terminals may be priced as low as \$100 with annual access charges of \$30 to \$50. This is a breakthrough in user costs and should find widespread popularity among boaters. No other system offers universal coverage at these prices.

. Complementary with Other Systems - many marine systems operate reasonably well under limited conditions but their utility will be enhanced by combining functions with ORBCOMM. For example, VHF marine radios operate well near the coast or other users but cease to function over the horizon. ORBCOMM terminals may be built into VHF marine radios to provide communications and emergency signaling when out of reach of other VHF radio users.


This has the advantage of shared use of VHF transmitters, receivers, power sources and antennas. Also, boaters who have LORAN or GPS receivers may know their position, but may be in a situation when they are unable to inform someone on shore of that vital information. ORBCOMM and LORAN/GPS are natural partners when it comes to navigation and Mayday requirements.

IMI has 15 years of experience in meeting the demanding requirements of boaters. We are confident that if ORBCOMM meets its stated cost and service quality objectives that the service will find wide acceptance in the marine industry and no doubt will save lives.

III. Summary

IMI, as one of the world's largest suppliers of components, hardware and accessories to private yachters and boaters, is very knowledgeable about existing communications and position determination systems available to the marine industry. ORBCOMM promises to add significantly to the enjoyment and safety of boating by making available an innovative and low cost range of communications and position determination services. Considering the potential to enhance safety and to make these services available to more people, the Commission is requested to act quickly to allocate spectrum to the new LEO MSS service and to license ORBCOMM. Also, as a special interest to boaters who travel throughout the world, the Commission is urged to pursue vigorously a worldwide primary allocation of spectrum to the service at the upcoming WARC-92 conference.

Respectfully submitted,



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