

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of Application of)	
)	File No. SAT-MOD-20111021-00207
ORBCOMM License Corp.)	File No. SAT-AMD-20130212-00020
)	
For Authority to Modify its Non-Voice, Non-)	File No. SAT-AMD-2015_____
Geostationary Satellite Service Space)	
Segment License (S2103) to Revise the Next-)	
Generation Satellite Deployment Plan)	

NARRATIVE EXHIBIT

By this submission (the “Fourth Amendment”), ORBCOMM License Corp. (“ORBCOMM”) further amends the above-captioned application to modify its Non-Voice, Non-Geostationary (“NVNG”) Satellite Service FCC space segment license (the “Modification Application”).¹ Specifically, to the extent necessary, this Fourth Amendment respectfully requests Commission authorization to add a second 50 kHz feeder downlink channel centered at

¹ See, FCC Call Sign S2103. See, also, *In the Matter of Applications by ORBCOMM License Corp. For Authority to Modify its Non-Voice, Non-Geostationary Satellite System*, Order & Authorization, DA 08-633 (March 21, 2008), 23 FCC Rcd 4804 (2008) (the “Next-Generation Space Segment License”). *Modification Application*, File No. SAT-MOD-20111021-00207, *FCC Public Notice*, Report No. SAT-00825, released December 2, 2011. In addition to the request set forth in this Fourth Amendment, ORBCOMM’s February 12, 2013, request for waiver or modification of the final Next-Generation Space Segment License milestone is the only other *Modification Application* request that currently remains pending before the Commission. See, *Modification Application Further Amendment & Supplement*, File No. SAT-AMD-20130212-00020, *FCC Public Notice*, Report No. SAT-00933, released March 1, 2013. See, also, *Stamp Grant, Slip Op.*, File Nos. SAT-MOD-20111021-00207 & SAT-AMD-20140116-00006, FCC International Bureau, Satellite Division, Satellite Policy Branch, March 26, 2014, *FCC Public Notice*, Report No. SAT-01006, released March 28, 2014; *Stamp Grant, Slip Op.*, File Nos. SAT-MOD-20111021-00207 & SAT-AMD-20140116-00006, FCC International Bureau, Satellite Division, Satellite Policy Branch, May 23, 2014; and *Stamp Grant, Slip Op.*, File Nos. SAT-MOD-20111021-00207, SAT-AMD-20120809-00125 & SAT-AMD-20130212-00020, FCC International Bureau, Satellite Division, Satellite Policy Branch, September 18, 2014, *FCC Public Notice*, Report No. SAT-01042, released September 19, 2014.

137.4 MHz to the currently authorized ORBCOMM feeder link frequency plan. The additional feeder downlink channel is requested to facilitate expanded backhaul throughput capacity and coverage for the ORBCOMM NVNG satellite constellation to support increasing message traffic flow. The new additional feeder downlink channel will be made available for use by all ORBCOMM satellites authorized under FCC Call Sign S2103. All technical parameters for operations on the requested additional feeder downlink channel will be identical to those currently authorized for operations on the existing ORBCOMM 50 kHz feeder downlink channel centered at 137.56 MHz. ORBCOMM's search of the Commission's records reveals no existing assignments in the 137 - 138 MHz band frequency allocation block that could result in harmful interference to any other Commission licensee from ORBCOMM's proposed new feeder downlink channel assignment. Additionally, ORBCOMM searches of the ITU MIFR and ITU frequency coordination data indicate that ORBCOMM's proposed new feeder downlink channel assignment can be successfully coordinated and notified in accordance with the International Radio Regulations.

CONCLUSION

Please associate this submission with the record of ORBCOMM's Modification Application. ORBCOMM respectfully requests that the Commission act promptly to grant the above-captioned modification application to modify the ORBCOMM NVNG Satellite Service FCC space segment license, as further amended by this submission. The additional network backhaul capacity and coverage capacity provided by the requested additional feeder downlink

channel will allow ORBCOMM to better serve the growing worldwide demand for NVNG services, and will thus serve the public interest, convenience and necessity.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'Walter H. Sonnenfeldt', with a stylized flourish at the end.

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April 20, 2015