

S2103 SAT-AMD-20150420-00027 IB2015000736  
ORBCOMM License Corp.  
ORBCOMM GENERATION 2



File # SAT-AMD-20150420-00027

(see also  
SAT-MOD-20111021-00207)

Call Sign S2103 Grant Date 12/17/15  
(or other identifier)

Term Dates  
From 12/17/15 To: \_\_\_\_\_

Approved by OMB  
3060-0678

Approved: Stephen J. Duall

Stephen J. Duall  
Chief, Satellite Policy Branch

Date & Time Filed: Apr 20 2015 3:29:50:366PM  
File Number: SAT-AMD-20150420-00027

\* with conditions

FCC APPLICATION FOR SPACE AND EARTH STATION:MOD OR AMD – MAIN FORM	FCC Use Only
FCC 312 MAIN FORM FOR OFFICIAL USE ONLY	

APPLICANT INFORMATION

Enter a description of this application to identify it on the main menu:  
Space Segment LIC ModApp AMD4 – Add New Feeder Downlink Channel

1-8. Legal Name of Applicant

<b>Name:</b>	ORBCOMM License Corp.	<b>Phone Number:</b>	585-461-3018
<b>DBA Name:</b>		<b>Fax Number:</b>	585-461-3476
<b>Street:</b>	395 West Passaic Street	<b>E-Mail:</b>	sonnenfeldt.walter@orbcomm.com
	Suite 325		
<b>City:</b>	Rochelle Park	<b>State:</b>	NJ
<b>Country:</b>	USA	<b>Zipcode:</b>	07662 -3016
<b>Attention:</b>	Walter H. Sonnenfeldt		

**ORBCOMM License Corp.**  
**IBFS File Nos. SAT-MOD-20111021-00207 and SAT-AMD-20150420-00027**  
**Call Sign S2103**

The application of ORBCOMM License Corp. (ORBCOMM), as amended, IBFS File Nos. SAT-MOD-20111021-00207 and SAT-AMD-20150420-00027, to modify its authorization for a non-voice, non-geostationary mobile-satellite service (NVNG MSS) system IS GRANTED in part and DEFERRED in part. Specifically, we grant the request in IBFS File No. SAT-AMD-20150420-00027 for authority to operate a second 50 kHz feeder downlink channel, centered at 137.4 MHz, with all authorized space stations in the ORBCOMM system. We defer action on ORBCOMM's remaining request in IBFS File No. SAT-MOD-20111021-00207, as amended by IBFS File No. SAT-AMD-20130212-00020, for modification or waiver of the final milestone requirement in its authorization for next-generation satellites.<sup>1</sup> This authorization is subject to compliance with the terms, conditions, and technical specifications set forth in ORBCOMM's application, the Federal Communications Commission's rules not waived herein, and the following conditions:

1. Consistent with International Bureau precedent,<sup>2</sup> we waive Sections 25.156(d)(1) and 25.157 of the Commission's rules, 47 C.F.R. §§ 25.156(d)(1), 25.157, on our own motion to permit consideration of ORBCOMM's request for assignment of the 137.4125-137.4225 MHz frequency band under the Commission's first-come, first-served application processing procedure, rather than under the processing round procedure.<sup>3</sup>
2. ORBCOMM must provide the Commission with the information required for appropriate advance publication, coordination, and notification of the 137.375-137.425 MHz frequency assignment pursuant to the Radio Regulations of the International Telecommunication Union. No protection from interference caused by radio stations authorized by other Administrations is guaranteed unless ITU procedures are timely completed or, with respect to individual Administrations, coordination agreements are successfully completed. This authorization may be subject to additional terms and conditions required for coordination of the frequency assignment with other Administrations. *See* 47 C.F.R. § 25.111(b).

---


<sup>1</sup> *See Applications by Orbcomm License Corp. for Authority to Modify its Non-Voice, Non-Geostationary Satellite System*, Order and Authorization, [DA 08-633](#), 23 FCC Rcd 4804, 4813, ¶ 23 (IB and OET 2008) (*Next Generation License*). This grant is without prejudice to any decision on that request.

<sup>2</sup> *See, e.g., Policy Branch Information, Actions Taken*, Public Notice, [DA 05-3278](#), 20 FCC Rcd 20273 (rel. Dec. 22, 2005) (announcing the availability of NVNG MSS spectrum to new applicants under the first-come, first-served processing procedure); *Policy Branch Information, Spectrum Available*, Public Notice, [DA 04-791](#), 19 FCC Rcd 5368 (rel. Mar. 25, 2004) (same).

<sup>3</sup> *See* 47 C.F.R. § 25.158. Within the 137.375-137.425 MHz frequency band requested by ORBCOMM, the 137.375-137.4125 MHz band was assigned to System 2 (Final Analysis Communication Services, Inc.) in the second NVNG MSS processing round. *See Amendment of Part 25 of the Commission's Rules to Establish Rules and Policies Pertaining to the Second Processing Round of the Non-Voice, Non-Geostationary Mobile Satellite Service*, Report and Order, IB Docket No. 96-220, [FCC 97-370](#), 13 FCC Rcd 9111, ¶ 34 (1997) (*Second Processing Round Order*). It has been made available to NVNG MSS applicants under the first-come, first-served application processing procedure. *See Final Analysis Communication Services, Inc., Authorization to Construct, Launch and Operate a Non-Voice, Non-Geostationary Mobile Satellite System in the 148-150.5 MHz, 400.15-401 MHz, and 137-138 MHz Bands*, Memorandum Opinion and Order, [DA 04-727](#), 19 FCC Rcd 4768, 4786, ¶ 48 (IB 2004); *Policy Branch Information, Spectrum Available*, Public Notice, [DA 04-732](#), 19 FCC Rcd 4804 (rel. Mar. 17, 2004). The 137.4225-137.425 MHz segment is already assigned to ORBCOMM. *See Second Processing Round Order*, 13 FCC Rcd 9111, ¶ 43; *Application of Orbital Communications Corporation for Modification of Its Authorization to Construct, Launch and Operate a Non-Voice, Non-Geostationary Mobile-Satellite System in the 137-138, 148-150.05, and 400.15-401 MHz Frequency Bands*, Order and Authorization, [DA 98-617](#), 13 FCC Rcd 10828, 10836, ¶ 18; *Next Generation License*, 23 FCC Rcd at 4813, ¶ 23a.

**ORBCOMM License Corp.**  
**IBFS File Nos. SAT-MOD-20111021-00207 and SAT-AMD-20150420-00027**  
**Call Sign S2103**

3. ORBCOMM is afforded 30 days from the date of this action to decline this grant, as conditioned. Failure to respond within this period will constitute formal acceptance of the grant, as conditioned.
4. This action is taken pursuant to the Commission's rules on delegated authority, 47 C.F.R. § 0.261, and is effective immediately. Petitions for reconsideration under Section 1.106, or applications for review under Section 1.115 of the Commission's rules, 47 C.F.R. §§ 1.106, 1.115, may be filed within 30 days of the date of the public notice indicating that this action was taken.

 <b>GRANTED</b> International Bureau *with conditions	<b>File #</b> <u>SAT-AMD-20150420-00027</u>
	<b>Call Sign</b> <u>S2103</u> <b>Grant Date</b> <u>12/17/15</u> (or other identifier)
	<b>Term Dates</b> <b>From</b> <u>12/17/15</u> <b>To</b> _____
	<b>Approved:</b> <u><i>Stephen J. Dwall</i></u> Stephen J. Dwall Chief, Satellite Policy Branch

\*\* Action on SAT-MOD-20111021-00207  
IS DEFERRED \*\*

9-16. Name of Contact Representative

<b>Name:</b>	Walter H. Sonnenfeldt, Vice President Regulatory Affairs	<b>Phone Number:</b>	585-461-3018
<b>Company:</b>	ORBCOMM Inc.	<b>Fax Number:</b>	585-461-3476
<b>Street:</b>	395 West Passaic Street	<b>E-Mail:</b>	sonnenfeldt.walter@orbcomm.com
	Suite 325		
<b>City:</b>	Rochelle Park	<b>State:</b>	NJ
<b>Country:</b>	USA	<b>Zipcode:</b>	07662-3016
<b>Attention:</b>		<b>Relationship:</b>	

CLASSIFICATION OF FILING

<p>17. Choose the button next to the classification that applies to this filing for both questions a. and b. Choose only one for 17a and only one for 17b.</p> <p><input type="radio"/> a1. Earth Station</p> <p><input checked="" type="radio"/> a2. Space Station</p>	<p>(N/A) b1. Application for License of New Station</p> <p>(N/A) b2. Application for Registration of New Domestic Receive-Only Station</p> <p><input checked="" type="radio"/> b3. Amendment to a Pending Application</p> <p><input type="radio"/> b4. Modification of License or Registration</p> <p>b5. Assignment of License or Registration</p> <p>b6. Transfer of Control of License or Registration .</p> <p><input type="radio"/> b7. Notification of Minor Modification</p> <p>(N/A) b8. Application for License of New Receive-Only Station Using Non-U.S. Licensed Satellite</p> <p>(N/A) b9. Letter of Intent to Use Non-U.S. Licensed Satellite to Provide Service in the United States</p> <p>(N/A) b10. Other (Please specify)</p> <p>(N/A) b11. Application for Earth Station to Access a Non-U.S.satellite Not Currently Authorized to Provide the Proposed Service in the Proposed Frequencies in the United States</p> <p>(N/A) b12. Application for Database Entry</p> <p><input type="radio"/> b13. Amendment to a Pending Database Entry Application</p> <p><input type="radio"/> b14. Modification of Database Entry</p>
<p>17c. Is a fee submitted with this application?</p> <p><input checked="" type="radio"/> If Yes, complete and attach FCC Form 159. If No, indicate reason for fee exemption (see 47 C.F.R.Section 1.1114).</p> <p><input type="radio"/> Governmental Entity    <input type="radio"/> Noncommercial educational licensee</p> <p><input type="radio"/> Other(please explain):</p>	
<p>17d.</p> <p>Fee Classification CAW – Space Station Amendment(Non-Geostationary)</p>	

<p>18. If this filing is in reference to an existing station, enter:</p> <p>(a) Call sign of station: S2103</p>	<p>19. If this filing is an amendment to a pending application enter both fields, if this filing is a modification please enter only the file number:</p> <p>(a) Date pending application was filed: 10/21/2011</p> <p>(b) File number: SATMOD2011102100207</p>
---	---

**TYPE OF SERVICE**

<p>20. NATURE OF SERVICE: This filing is for an authorization to provide or use the following type(s) of service(s): Select all that apply:</p> <p><input type="checkbox"/> a. Fixed Satellite</p> <p><input checked="" type="checkbox"/> b. Mobile Satellite</p> <p><input type="checkbox"/> c. Radiodetermination Satellite</p> <p><input type="checkbox"/> d. Earth Exploration Satellite</p> <p><input type="checkbox"/> e. Direct to Home Fixed Satellite</p> <p><input type="checkbox"/> f. Digital Audio Radio Service</p> <p><input type="checkbox"/> g. Other (please specify)</p>	
<p>21. STATUS: Choose the button next to the applicable status. Choose only one.</p> <p><input type="radio"/> Common Carrier    <input checked="" type="radio"/> Non-Common Carrier</p>	<p>22. If earth station applicant, check all that apply.</p> <p><input type="checkbox"/> Using U.S. licensed satellites</p> <p><input type="checkbox"/> Using Non-U.S. licensed satellites</p>
<p>23. If applicant is providing INTERNATIONAL COMMON CARRIER service, see instructions regarding Sec. 214 filings. Choose one. Are these facilities:</p> <p><input type="radio"/> Connected to a Public Switched Network    <input type="radio"/> Not connected to a Public Switched Network    <input checked="" type="radio"/> N/A</p>	

24. FREQUENCY BAND(S): Place an 'X' in the box(es) next to all applicable frequency band(s).

- a. C-Band (4/6 GHz)     b. Ku-Band (12/14 GHz)  
 c. Other (Please specify upper and lower frequencies in MHz.)

Frequency Lower: 137

Frequency Upper: 401

(Please specify additional frequencies in an attachment)

#### TYPE OF STATION

25. CLASS OF STATION: Choose the button next to the class of station that applies. Choose only one.

- a. Fixed Earth Station  
 b. Temporary-Fixed Earth Station  
 c. 12/14 GHz VSAT Network  
 d. Mobile Earth Station  
 e. Geostationary Space Station  
 f. Non-Geostationary Space Station  
 g. Other (please specify)

26. TYPE OF EARTH STATION FACILITY:

- Transmit/Receive     Transmit-Only     Receive-Only     N/A

"For Space Station applications, select N/A."

PURPOSE OF MODIFICATION

27. The purpose of this proposed modification is to: (Place an 'X' in the box(es) next to all that apply.)

- a -- authorization to add new emission designator and related service
- b -- authorization to change emission designator and related service
- c -- authorization to increase EIRP and EIRP density
- d -- authorization to replace antenna
- e -- authorization to add antenna
- f -- authorization to relocate fixed station
- g -- authorization to change frequency(ies)
- h -- authorization to add frequency
- i -- authorization to add Points of Communication (satellites & countries)
- j -- authorization to change Points of Communication (satellites & countries)
- k -- authorization for facilities for which environmental assessment and radiation hazard reporting is required
- l -- authorization to change orbit location
- m -- authorization to perform fleet management
- n -- authorization to extend milestones
- o -- Other (Please specify)



ENVIRONMENTAL POLICY

28. Would a Commission grant of any proposal in this application or amendment have a significant environmental impact as defined by 47 CFR 1.1307? If YES, submit the statement as required by Sections 1.1308 and 1.1311 of the Commission's rules, 47 C.F.R. 1.1308 and 1.1311, as an exhibit to this application. A Radiation Hazard Study must accompany all applications for new transmitting facilities, major modifications, or major amendments.  Yes  No

ALIEN OWNERSHIP Earth station applicants not proposing to provide broadcast, common carrier, aeronautical en route or aeronautical fixed radio station services are not required to respond to Items 30–34.

29. Is the applicant a foreign government or the representative of any foreign government?	<input type="radio"/> Yes <input checked="" type="radio"/> No
30. Is the applicant an alien or the representative of an alien?	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> N/A
31. Is the applicant a corporation organized under the laws of any foreign government?	<input type="radio"/> Yes <input checked="" type="radio"/> No <input type="radio"/> N/A
32. Is the applicant a corporation of which more than one-fifth of the capital stock is owned of record or voted by aliens or their representatives or by a foreign government or representative thereof or by any corporation organized under the laws of a foreign country?	<input type="radio"/> Yes <input type="radio"/> No <input checked="" type="radio"/> N/A

33. Is the applicant a corporation directly or indirectly controlled by any other corporation of which more than one-fourth of the capital stock is owned of record or voted by aliens, their representatives, or by a foreign government or representative thereof or by any corporation organized under the laws of a foreign country?

Yes  No  N/A

34. If any answer to questions 29, 30, 31, 32 and/or 33 is Yes, attach as an exhibit an identification of the aliens or foreign entities, their nationality, their relationship to the applicant, and the percentage of stock they own or vote.

#### BASIC QUALIFICATIONS

35. Does the Applicant request any waivers or exemptions from any of the Commission's Rules?  
If Yes, attach as an exhibit, copies of the requests for waivers or exceptions with supporting documents.

Yes  No

36. Has the applicant or any party to this application or amendment had any FCC station authorization or license revoked or had any application for an initial, modification or renewal of FCC station authorization, license, or construction permit denied by the Commission? If Yes, attach as an exhibit, an explanation of circumstances.

Yes  No

37. Has the applicant, or any party to this application or amendment, or any party directly or indirectly controlling the applicant ever been convicted of a felony by any state or federal court? If Yes, attach as an exhibit, an explanation of circumstances.

Yes  No

38. Has any court finally adjudged the applicant, or any person directly or indirectly controlling the applicant, guilty of unlawfully monopolizing or attempting unlawfully to monopolize radio communication, directly or indirectly, through control of manufacture or sale of radio apparatus, exclusive traffic arrangement or any other means or unfair methods of competition? If Yes, attach as an exhibit, an explanation of circumstances

Yes  No

39. Is the applicant, or any person directly or indirectly controlling the applicant, currently a party in any pending matter referred to in the preceding two items? If yes, attach as an exhibit, an explanation of the circumstances.

Yes  No

40. If the applicant is a corporation and is applying for a space station license, attach as an exhibit the names, address, and citizenship of those stockholders owning a record and/or voting 10 percent or more of the Filer's voting stock and the percentages so held. In the case of fiduciary control, indicate the beneficiary(ies) or class of beneficiaries. Also list the names and addresses of the officers and directors of the Filer. Ownership Exhibit

41. By checking Yes, the undersigned certifies, that neither applicant nor any other party to the application is subject to a denial of Federal benefits that includes FCC benefits pursuant to Section 5301 of the Anti-Drug Act of 1988, 21 U.S.C. Section 862, because of a conviction for possession or distribution of a controlled substance. See 47 CFR 1.2002(b) for the meaning of "party to the application" for these purposes.

Yes  No

42a. Does the applicant intend to use a non-U.S. licensed satellite to provide service in the United States? If Yes, answer 42b and attach an exhibit providing the information specified in 47 C.F.R. 25.137, as appropriate. If No, proceed to question 43.

Yes  No

42b. What administration has licensed or is in the process of licensing the space station? If no license will be issued, what administration has coordinated or is in the process of coordinating the space station?

43. Description. (Summarize the nature of the application and the services to be provided). (If the complete description does not appear in this box, please go to the end of the form to view it in its entirety.)

Space Segment License Modification Application Amendment adding request to authorize a second 50 kHz feeder downlink channel for use by all ORBCOMM satellites.

Narrative Exhibit

43a. Geographic Service Rule Certification

By selecting A, the undersigned certifies that the applicant is not subject to the geographic service or geographic coverage requirements specified in 47 C.F.R. Part 25.

A

By selecting B, the undersigned certifies that the applicant is subject to the geographic service or geographic coverage requirements specified in 47 C.F.R. Part 25 and will comply with such requirements.

B

By selecting C, the undersigned certifies that the applicant is subject to the geographic service or geographic coverage requirements specified in 47 C.F.R. Part 25 and will not comply with such requirements because it is not feasible as a technical matter to do so, or that, while technically feasible, such services would require so many compromises in satellite design and operation as to make it economically unreasonable. A narrative description and technical analysis demonstrating this claim are attached.

C

CERTIFICATION

The Applicant waives any claim to the use of any particular frequency or of the electromagnetic spectrum as against the regulatory power of the United States because of the previous use of the same, whether by license or otherwise, and requests an authorization in accordance with this application. The applicant certifies that grant of this application would not cause the applicant to be in violation of the spectrum aggregation limit in 47 CFR Part 20. All statements made in exhibits are a material part hereof and are incorporated herein as if set out in full in this application. The undersigned, individually and for the applicant, hereby certifies that all statements made in this application and in all attached exhibits are true, complete and correct to the best of his or her knowledge and belief, and are made in good faith.

44. Applicant is a (an): (Choose the button next to applicable response.)

- Individual
- Unincorporated Association
- Partnership
- Corporation
- Governmental Entity
- Other (please specify)

45. Name of Person Signing  
Marc J. Eisenberg

—>

46. Title of Person Signing  
Chief Executive Officer

WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND / OR IMPRISONMENT  
(U.S. Code, Title 18, Section 1001), AND/OR REVOCATION OF ANY STATION AUTHORIZATION  
(U.S. Code, Title 47, Section 312(a)(1)), AND/OR FORFEITURE (U.S. Code, Title 47, Section 503).

**FCC NOTICE REQUIRED BY THE PAPERWORK REDUCTION ACT**

The public reporting for this collection of information is estimated to average 2 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the required data, and completing and reviewing the collection of information. If you have any comments on this burden estimate, or how we can improve the collection and reduce the burden it causes you, please write to the Federal Communications Commission, AMD-PERM, Paperwork Reduction Project (3060-0678), Washington, DC 20554. We will also accept your comments regarding the Paperwork Reduction Act aspects of this collection via the Internet if you send them to PRA@fcc.gov. PLEASE DO NOT SEND COMPLETED FORMS TO THIS ADDRESS.

Remember – You are not required to respond to a collection of information sponsored by the Federal government, and the government may not conduct or sponsor this collection, unless it displays a currently valid OMB control number or if we fail to provide you with this notice. This collection has been assigned an OMB control number of 3060-0678.

**THE FOREGOING NOTICE IS REQUIRED BY THE PAPERWORK REDUCTION ACT OF 1995, PUBLIC LAW 104-13, OCTOBER 1, 1995, 44 U.S.C. SECTION 3507.**

**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-Geostationary Satellite Service Space Segment License (S2103) to Revise the Next-Generation Satellite Deployment Plan	)	File No. SAT-AMD-2015_____

**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”).<sup>1</sup> Specifically, to the extent necessary, this Fourth Amendment respectfully requests Commission authorization to add a second 50 kHz feeder downlink channel centered at

---

<sup>1</sup> 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 black ink, appearing to read "Walter H. Sonnenfeldt".

Walter H. Sonnenfeldt, Esq.  
Regulatory Counsel  
ORBCOMM License Corp. &  
Vice President, Regulatory Affairs  
ORBCOMM Inc.  
Direct Tel: (585) 461-3018  
E-Mail: [sonnenfeldt.walter@orbcomm.com](mailto:sonnenfeldt.walter@orbcomm.com)

April 20, 2015