



January 4, 2012

VIA IBFS

Robert Nelson, Chief
Satellite Division
International Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

**Re: Application of ORBCOMM License Corp. 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-MOD-20111021-00207

REQUEST FOR EXTENSION OF TIME

Dear Mr. Nelson:

On October 21, 2011, ORBCOMM License Corp. (“ORBCOMM”) filed the above-referenced application (the “Modification Application”) to modify its Non-Voice, Non-Geostationary Satellite Service FCC space segment license (FCC Call Sign S2103) to revise the deployment plan for the eighteen currently authorized ORBCOMM Generation 2 (“OG2”) satellites. The Modification Application was accepted for filing and placed on Public Notice on December 2, 2011.¹ On December 6, 2011, the International Bureau requested that ORBCOMM submit additional information to supplement the Modification Application on or before January 5, 2012 (the “Supplemental Information Request”).² For the reasons stated below, ORBCOMM respectfully requests a sixty (60) day extension of time to respond to the Supplemental Information Request.

¹ *FCC Public Notice*, Report No. SAT-00825, released December 2, 2011. As of the date of this submission, no oppositions to the Modification Application have been entered in the IBFS record of the Modification Application or served on ORBCOMM.

² December 6, 2011, *Letter from Robert G. Nelson, Chief, Satellite Division, to Walter H. Sonnenfeldt and Stephen L. Goodman, counsel for ORBCOMM License Corp.*

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Late last month, due in part to unforeseeable changed circumstances, ORBCOMM Inc. and launch service provider Space Exploration Technologies (“SpaceX”) agreed to new revisions of the planned deployment program for the eighteen currently authorized OG2 satellites. The launch of the first OG2 spacecraft is now planned for mid-year 2012 as a secondary payload on the first scheduled Falcon 9 Commercial Resupply Services (“CRS1”) NASA mission. Two additional OG2 satellites are now planned for deployment later in 2012 in a high inclination orbit as a secondary Falcon 9 payload. A dedicated Falcon 9 mission now planned for 2013 will deploy at least eight additional OG2 satellites, with the remaining OG2 spacecraft to be deployed by 2014. ORBCOMM and SpaceX are working to finalize the full details of the planned OG2 deployment plan revisions that are necessary to prepare a conforming amendment to the Modification Application.

Due to the above-described changed circumstances, and in the interest of administrative efficiency, ORBCOMM is hereby requesting an extension of time to respond to the Supplemental Information Request. Grant of this request will allow ORBCOMM to incorporate the additional requested information as it relates to the revised OG2 deployment plan. This should help to streamline the Commission’s review of the Modification Application, and thereby serve the public interest, convenience, and necessity. Accordingly, there is good cause for grant of the requested extension of time.

Kindly direct any inquiries concerning this submission to the undersigned.

Respectfully submitted,



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