



March 5, 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 FURTHER EXTENSION OF TIME**

Dear Mr. Nelson:

On December 6, 2011, the International Bureau requested that ORBCOMM submit additional information on or before January 5, 2012, to supplement the above-referenced application (the "Supplemental Information Request").<sup>1</sup> On January 18, 2012, the Chief of the Satellite Branch granted ORBCOMM's January 4, 2012 request for a sixty (60) day extension of time to respond to the Supplemental Information Request.<sup>2</sup> For the reasons explained below, ORBCOMM respectfully requests a further ninety (90) day extension of time to supplement and amend the Modification Application.

In late December 2011, due in part to unforeseeable changed circumstances, ORBCOMM and launch service provider Space Exploration Technologies ("SpaceX") agreed to revise the planned deployment program for the eighteen currently authorized ORBCOMM Generation 2

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<sup>1</sup> December 6, 2011, *Letter from Robert G. Nelson, Chief, Satellite Division, to Walter H. Sonnenfeldt and Stephen L. Goodman, counsel for ORBCOMM License Corp.* ORBCOMM's application (the "Modification Application") was accepted for filing and placed on Public Notice on December 2, 2011. See, *FCC Public Notice*, Report No. SAT-00825, released December 2, 2011. No oppositions to the Modification Application were entered in the IBFS record of the Modification Application or served on ORBCOMM.

<sup>2</sup> January 4, 2012, *Letter from Walter H. Sonnenfeldt to Robert G. Nelson, Chief, Satellite Division* (Stamp Grant, Stephen J. Duall, Chief, Satellite Policy Branch, January 18, 2012), *FCC Public Notice*, Report No. SAT-00838, released January 20, 2012.

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("OG2") satellites. Since then, ORBCOMM has taken all possible measures to finalize the full details of the revised OG2 deployment plan. ORBCOMM is working closely with SpaceX to confirm the planned mission profiles and schedules for a series of Falcon 9 launches. The process of finalizing launch mission profiles and schedules for a coordinated multi-satellite non-geostationary fleet replenishment is quite complex under the best of circumstances. These efforts have been particularly complicated and time consuming because the first available Falcon 9 launches must fly OG2 satellites as secondary payloads, and there have been slippages in primary mission schedules. Delays such as these are not unusual in space projects, but are clearly beyond ORBCOMM's reasonable control. For these reasons, it has not yet been possible for ORBCOMM to finalize the revised OG2 deployment plan in sufficient detail necessary to prepare an amendment to the Modification Application that fully conforms to the applicable Commission Rules and Policies.

Due to the above-described circumstances, and in the interest of administrative efficiency, ORBCOMM is hereby requesting a further ninety (90) day 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 further extension of time.

Kindly direct any inquiries concerning this submission to the undersigned.

Respectfully submitted,



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