

Date & Time Filed: Jul 25 2008 2:33:21:060PM
File Number: SAT-STA-20080725-00149
Callsign:

FEDERAL COMMUNICATIONS COMMISSION
APPLICATION FOR SPACE STATION SPECIAL TEMPORARY AUTHORITY
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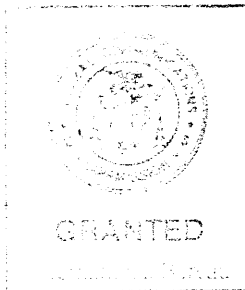
APPLICANT INFORMATION

Enter a description of this application to identify it on the main menu:
Request For Special Temporary Authority To Utilize Two (2) Alternate GES downlink channels in the 137-138 MHz band

1. Applicant

Name:	ORBCOMM License Corp.	Phone Number:	585-461-3018
DBA Name:		Fax Number:	585-461-3476
Street:	ORBCOMM License Corp.	E-Mail:	sonnenfeldt.walter@orbcomm.com
	2115 Linwood Ave. Suite 100		
City:	Fort Lee	State:	NJ
Country:	USA	Zipcode:	07024 -
Attention:	Walter H Sonnenfeldt		

*subject to conditions
of the application
variable*



File # SAT-STA-20080725-00149
Call Sign _____ Grant Date 8/15/08
(or other identifier)
From 8/15/08 Term Dates To: + 60 days
Approved: *[Signature]*
Policy Branch Chief

2. Contact	
Name: Walter H. Sonnenfeldt	Phone Number: 585-461-3018
Company: ORBCOMM Inc.	Fax Number: 585-461-3476
Street: 2115 Linwood Avenue	E-Mail: sonnenfeldt.walter@orbcomm.com
Suite 100	
City: Fort Lee	State: NJ
Country: USA	Zipcode: 07024 -
Attention:	Relationship: Same
(If your application is related to an application filed with the Commission, enter either the file number or the IB Submission ID of the related application. Please enter only one.)	
3. Reference File Number or Submission ID	
4a. Is a fee submitted with this application?	
<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).	
<input type="radio"/> Governmental Entity <input type="radio"/> Noncommercial educational licensee	
<input type="radio"/> Other (please explain):	
4b. Fee Classification CXW - Space Station (Non-Geostationary)	
5. Type Request	
<input type="radio"/> Change Station Location <input type="radio"/> Extend Expiration Date <input checked="" type="radio"/> Other	
6. Temporary Orbit Location	7. Requested Extended Expiration Date

8. Description (If the complete description does not appear in this box, please go to the end of the form to view it in its entirety.)		
<div style="border: 1px solid black; padding: 10px; margin: 0 auto; width: 80%;"> ORBCOMM License Corp. respectfully requests a sixty-day Special Temporary Authority to allow use in the United States of two (2) alternate 50 kHz gateway earth station (</div>		
9. 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. <input checked="" type="radio"/> Yes <input type="radio"/> No 		
10. Name of Person Signing Walter H. Sonnenfeldt	11. Title of Person Signing Vice President, Regulatory Affairs	
12. Please supply any need attachments.		
Attachment 1: Narrative Exhibit	Attachment 2:	Attachment 3:
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).		

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Attachment 1

Narrative Exhibit ORBCOMM License Corp. Request for Special Temporary Authority

Pursuant to Section 25.120 of the Commission's Rules (47 C.F.R. §25.120), ORBCOMM License Corp. ("ORBCOMM"), the holder of the Commission authorizations¹ issued for the ORBCOMM Non-Voice, Non-Geostationary Mobile Satellite Service system (the "ORBCOMM System"), respectfully requests a sixty-day² Special Temporary Authority ("STA") to allow use in the United States of two (2) alternate 50 kHz gateway earth station ("GES") downlink channels centered on 137.225 MHz and 137.695 MHz. For the reasons stated below, ORBCOMM requests expedited Commission processing and grant of this STA request.

ORBCOMM can activate the requested GES downlink STA assignments by sending control commands to the subject ORBCOMM satellites and U.S. GESs, without any need for equipment alterations. The requested GES downlink STA assignments are located in two segments of the 137 – 138 MHz band that are currently used for ORBCOMM subscriber downlinks in accordance with the ORBCOMM FCC Licenses. STA operation of the two alternate GES downlink channels will be limited to the coverage area of the four FCC-licensed ORBCOMM GESs located in the United States. Because the requested frequencies are currently licensed for ORBCOMM's use, and have been successfully coordinated and notified internationally, no harmful interference to any other authorized system should result from the proposed temporary GES downlink operations.

¹ See, FCC Space Station Call Sign S2103, and FCC Earth Station Call Signs E940534, E940535, E940536, E940537 & E940538 (the "ORBCOMM FCC Licenses"). The ORBCOMM FCC Licenses currently permit regular operational GES downlink transmissions in the 137 – 138 MHz band on a 50 kHz channel centered at 137.56 MHz.

² Because objective (2) relating to the testing that will be conducted under the proposed STA could lead to an Modification Application for regular authority, ORBCOMM requests that this STA request be granted on an expedited basis in accordance with Section 25.120(b)(3) of the Commission's Rules. *"The Commission may grant a temporary authorization for a period not to exceed 60 days, if the STA request has not been placed on public notice, and the applicant plans to file a request for regular authority for the service."* 47 C.F.R. §25.120(b)(3).

ORBCOMM is requesting this STA for two reasons³:

1. To allow for more flexible and comprehensive performance verification testing for the GES downlink transmitters on the six new ORBCOMM replacement satellites launched on June 19, 2008; and
2. To evaluate the feasibility of dynamic reuse of the subject spectrum for both GES downlinks and Subscriber segment downlinks to increase the spectral efficiency and throughput capacity of the ORBCOMM System.

STA operation of the two alternate channels for GES downlinks will be initiated and controlled by enabling uplink commands sent via one of the four FCC-Licensed ORBCOMM GESs. All radio characteristics of the alternate channel GES downlink transmissions will be identical to those authorized for regular commercial operations on the 50 kHz channel centered at 137.56 MHz. ORBCOMM will limit the proposed testing to satellite passes in view of the CONUS region coverage area of the four FCC-Licensed GESs. No transmissions on the alternate GES downlink channels will be permitted while satellites are orbiting outside of the CONUS region coverage area of the four FCC-Licensed GESs. ORBCOMM intends to complete the testing as rapidly as possible following grant of the requested STA.

Expedited processing and grant of this STA request, and the resulting access to the two requested alternate GES downlink assignments will allow ORBCOMM to accelerate the completion of pre-operational testing of the new ORBCOMM satellites. It will also allow for comparative GES downlink performance analysis at different frequencies in the 137 – 138 MHz band. Furthermore, the proposed temporary operations will provide operational verification of the feasibility of a substantial increase in the spectral efficiency and capacity of the ORBCOMM System. For all of these reasons, expedited processing and grant of this STA request will serve the public interest, convenience, and necessity.

³

Supra, at FN 2.