

Attachment 1

Narrative Exhibit ORBCOMM License Corp. Request for Extension of Special Temporary Authority File No. SAT-STA-20080725-00149

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-day extension of the Special Temporary Authority issued on August 15, 2008, File No. SAT-STA-20080725-00149 (the “Flex-Use STA”). The requested extension will allow ORBCOMM to continue testing and evaluation of dynamic operational use of two (2) alternate 50 kHz gateway earth station (“GES”) downlink channels centered on 137.225 MHz and 137.695 MHz.² As shown below, there is good cause for grant of this extension request.

ORBCOMM obtained the Flex-Use STA for two purposes:

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.

Since the initial grant of the Flex-Use STA, ORBCOMM has obtained useful preliminary test results. Additional time is needed, however, to conduct further testing to verify more fully if the use of dynamic downlink operations will be feasible for regular commercial operations. Among other things, the new orbit plane of six ORBCOMM replacement satellites is still being transitioned to its operational orbit plane spacing

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 The Flex-Use STA alternate GES downlink 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 continue to be limited to the coverage area of the four FCC-licensed ORBCOMM GESs located in the United States.

configuration. Extending the Flex-Use STA will allow testing to continue with the new ORBCOMM satellites as they approach their operational status. This will allow ORBCOMM to conduct valuable further study, including a more accurate analysis of downlink frequency reuse feasibility as the new satellites are positioned in relation to the other spacecraft in the ORBCOMM constellation. The continued program of testing will provide more complete data to better verify the commercial feasibility of dynamic downlink operations in the operational ORBCOMM satellite constellation. For the above-stated reasons, expedited processing and grant of this extension request will serve the public interest, convenience, and necessity.