

**Application of ORBCOMM License Corp. for
Special Temporary Authorization**

**ORBCOMM Space Segment License
FCC Call Sign S2103**

**Application for Space Segment License Modification
File Nos. SAT-MOD-20111021-00207 & SAT-AMD-20120809-00125**

The ORBCOMM NVNG satellite constellation license (FCC Call Sign S2103, the “ORBCOMM Space Segment License”) currently authorizes the ongoing operations of the first-generation ORBCOMM satellites, and the launch and operation of the ORBCOMM Generation 2 (“OG2”) satellites. On October 2, 2012, ORBCOMM’s above-referenced application to modify the ORBCOMM Space Segment License (the “Modification Application”) was granted in part and deferred in part (the “Partial Grant”).¹ The Partial Grant was issued to permit the imminent launch of the first OG2 satellite at an orbit inclination modified from the previously authorized OG2 deployment plan.² ORBCOMM very much appreciates the dedicated efforts undertaken by the Commission staff to issue the Partial Grant in such a timely manner.

ORBCOMM’s Modification Application included a request to add a 50 kHz feeder uplink channel centered at 150.025 MHz (the “150 MHz Uplink Channel”) for authorized use by the entire ORBCOMM NVNG satellite constellation.³ However, the Partial Grant only authorized use of the 150 MHz Uplink Channel on the first OG2 satellite, and deferred action with regard to adding the 150 MHz Uplink Channel to the ORBCOMM Space Segment License for use by the entire ORBCOMM NVNG satellite constellation.⁴

Due to unforeseen circumstances arising from the Partial Grant limitations on use of the 150 MHz Uplink Channel, pursuant to Section 25.120(b)(3) of the Commission’s Rules,

¹ File Nos. SAT-MOD-20111021-00207 & SAT-AMD-20120809-00125, Granted in Part & Deferred in Part, *Stamp Grant, Slip Op.*, FCC International Bureau, Satellite Division, Satellite Policy Branch, October 2, 2012. *See, also*, Modification Application, File No. SAT-MOD-20111021-00207, FCC Public Notice, Report No. SAT-00825, released December 2, 2011. No oppositions to the Modification Application were entered in the IBFS record or served on ORBCOMM. On August 9, 2012, ORBCOMM filed an amendment to the Modification Application (the “Amendment”). *See*, File No. SAT-AMD-20120809-00125, FCC Public Notice, Report No. SAT-00893, released August 31, 2012. No oppositions to the Amendment were entered in the IBFS record or served on ORBCOMM.

² Partial Grant, *Conditions of Authorization Attachment*, at 1.

³ *See, e.g.*, Modification Application, Narrative Exhibit, at 9. *See, also*, FCC Public Notice, Report No. SAT-00825 (Released December 2, 2011). The Modification Application request to add the 150 MHz Uplink Channel to the ORBCOMM Space Segment License for use by the entire ORBCOMM NVNG satellite constellation is unopposed and ripe for grant.

⁴ Partial Grant, *Conditions of Authorization Attachment*, at 1.

ORBCOMM respectfully requests a 60-day Special Temporary Authorization (“STA”) for commencement on or before October 7, 2012, of utilization of the 150 MHz Uplink Channel by all satellites in the ORBCOMM NVNG satellite constellation, including the first OG2 satellite authorized by the Partial Grant. The parameters of operation for the 150 MHz Uplink Channel under the STA requested in this application will be as specified in the Modification Application.

Full use of the 150 MHz Uplink Channel as proposed in the Modification Application, and as requested in this STA application, is currently necessary for ORBCOMM to maintain simultaneous commercial service in the United States and connectivity to the new OG2 satellite during the critical early phases of its deployment. This is due, in substantial part, to the current hardware configurations of ORBCOMM’s four United States gateway earth station facilities (“US GESs”).⁵ It is presently only possible to maintain simultaneous connections between the US GESs, the new OG2 satellite, and the other operational satellites in the ORBCOMM NVNG satellite constellation, using a single uplink channel. The first OG2 satellite, scheduled for launch on October 7, 2012, is configured to use the 150 MHz Uplink Channel as authorized under the Partial Grant. The satellite has been integrated with the launch vehicle, and the feeder link configuration cannot be changed until after launch and the initial deployment and testing of the spacecraft. The only way ORBCOMM can currently operate the US GESs under the Partial Grant with the currently authorized GES hardware is to shut down 149.61 MHz commercial feeder link operations with all other ORBCOMM satellites when the new OG2 satellite requires connection via the 150 MHz Uplink Channel. The STA requested in this application will allow ORBCOMM to maintain connectivity with the new OG2 satellite without having to unnecessarily disrupt commercial feeder link operations, pending disposition of the unopposed Modification Application request to add the 150 MHz Uplink Channel to the ORBCOMM Space Segment License for use by the entire ORBCOMM NVNG satellite constellation . Thus, there is good cause for grant of this application, and the public interest, necessity and convenience will be well-served by prompt issuance of the requested STA.

⁵ ORBCOMM Arcade, NY Gateway Earth Station, FCC Call Sign E940535; ORBCOMM Ocilla, GA Gateway Earth Station, FCC Call Sign E940536; ORBCOMM St. Johns, AZ Gateway Earth Station, FCC Call Sign E940537; ORBCOMM East Wenatchee, WA Gateway Earth Station, FCC Call Sign E940538. ORBCOMM had intended to temporarily operate 150 MHz Uplink Channel uplinks on the US GESs under STA, and file applications to modify the above-referenced earth station authorizations for the US GESs once the Modification Application request to add the 150 MHz Uplink Channel to the ORBCOMM Space Segment License had been granted. Despite the unanticipated complications of the Partial Grant limitations on use of the 150 MHz Uplink Channel, ORBCOMM will file applications to modify the earth station licenses for the US GESs as soon as possible in the next several days.