

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )  
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NOAA Petition for Rulemaking to )  
Authorize Use of 406.025 MHz for )  
Personal Emergency Locator )  
Beacons )

RM No. 8267

COMMENTS OF ORBITAL COMMUNICATIONS CORPORATION

Orbital Communications Corporation ("ORBCOMM"), a wholly-owned subsidiary of Orbital Sciences Corporation ("OSC"), hereby comments on the petition for rulemaking filed by the National Oceanic and Atmospheric Administration ("NOAA").<sup>1/</sup> In its petition, NOAA seeks FCC rule modifications that would allow use of the 406.025 MHz frequency for personal locator beacons in conjunction with the COSPAS-SARSAT to meet the needs of individuals in remote locations. As detailed below, ORBCOMM supports the NOAA petition for rulemaking.

ORBCOMM was formed by its parent company to enter the mobile satellite services business. Founded in 1982, OSC is one of the country's leading commercial space technology companies. It is engaged in design, manufacturing, testing and operation of space launch vehicles, suborbital tracking and data systems, and satellite-based communications and remote sensing systems. In

<sup>1/</sup> Petition of National Oceanic and Atmospheric Administration, RM No. 8267, Public Notice 33546, June 15, 1993.

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February 1990, ORBCOMM submitted to the Commission a petition for amendment of Section 2.106 of the rules to establish a mobile satellite service for two-way data communications and position determination using low-Earth orbit ("LEO") satellites, along with an application for authority to construct such a satellite system.<sup>2/</sup> In response to the petition for rulemaking, the Commission has allocated spectrum for the new service,<sup>3/</sup> and has completed a negotiated rulemaking to develop the licensing and service rules.<sup>4/</sup>

ORBCOMM believes that LEO satellite systems can make available valuable services on a highly spectrum efficient basis, at unprecedented low cost. ORBCOMM detailed in its application a description of the potential services to be offered over the ORBCOMM system, including use of the system for search and rescue ("SAR") needs. Similarly, ORBCOMM had advocated in the PELTS proceeding the use of LEO satellite systems for search and rescue

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<sup>2/</sup> Orbital Communications Corporation, RM No. 7334, Public Notice Report No. 1814, April 4, 1990; Orbital Communications Corporation, File No. 22-DSS-MP-90(20), Public Notice Report No. DS-953, April 11, 1990. In addition, ORBCOMM has received authority to launch two satellites for a developmental program, which will be placed into orbit later this year. Experimental Licenses KE2XER, KE2XES, KE2XET, KE2XEY, KE2XFS and KE2XFT.

<sup>3/</sup>Amendment of Section 2.106 of the Commission's Rules to Allocate Spectrum to the Fixed-Satellite Service and the Mobile-Satellite Service for Low-Earth Orbit Satellites, ET Docket No. 91-280, FCC 93-29, released February 5, 1993.

<sup>4/</sup>The Advisory Committee was convened by the Commission pursuant to the Notice of Advisory Committee, 57 Fed. Reg. 33163 (July 27, 1992), and the work of the Advisory Committee was reflected in the Report of the Below 1 GHz LEO Negotiated Rulemaking Committee, CC Docket No. 92-76, September 16, 1992.

activities.<sup>5/</sup> ORBCOMM thus has long recognized that LEO satellite systems provide an excellent resource for SAR.

The COSPAS-SARSAT system has already proven itself in the provision of SAR services in the aeronautical and maritime fields. NOAA seeks to utilize this valuable resource in addition for individual personal locator beacons ("PLBs") in remote areas. According to the NOAA petition, some testing of such users has

and existing SAR systems. ORBCOMM fully intends to incorporate such compatibility into its system.

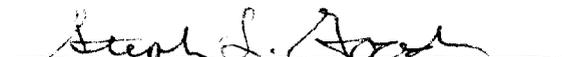
The ORBCOMM system can also serve as an important complement to the COSPAS-SARSAT system for search and rescue functions. When fully deployed, the ORBCOMM system will provide a high level of availability throughout the United States (as well as the rest of the globe), thus assuring virtually ubiquitous coverage. Moreover, the modest power requirements and special power saving features of ORBCOMM transceivers will allow

to the COSPAS-SARSAT system, ORBCOMM would be willing to conduct tests and demonstrations using early production PLBs as soon as the two satellites are operational.

In sum, in light of all of the potential benefits from expanding the usage of the 406.025 MHz frequency, as well as the supplemental benefits of NVNG satellite systems complementing COSPAS-SARSAT, ORBCOMM urges the Commission to initiate a rulemaking proceeding as requested by NOAA.

Respectfully submitted,

By

  
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