

# ORBCOMM™

June 30, 2015

2015 Annual Report

~~CONFIDENTIAL, NOT FOR PUBLIC INSPECTION~~

## HAND DELIVERED

International Bureau  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

RECEIVED - FCC

JUN 30 2015

Federal Communications Commission  
Bureau / Office

Re: **ORBCOMM License Corp.**  
**FCC Call Sign S2103**

**Annual Space Station Licensee Report**  
**47 C.F.R. §25.170**

**REQUEST TO WITHOLD ATTACHED CONFIDENTIAL**  
**COMMERCIALY SENSITIVE MATERIALS FROM PUBLIC**  
**INSPECTION – 47 C.F.R. § 0.457(d) & § 0.459**

Dear Sir or Madam:

Pursuant to Section 25.170 of the Commission's Rules, ORBCOMM License Corp. ("ORBCOMM") hereby submits the attached Annual Report on the state of the ORBCOMM Non-Voice Non-Geostationary mobile satellite service ("NVNG MSS") satellite system (the "Annual Report"). The entire content of ORBCOMM's Annual Report is **CONFIDENTIAL, ORBCOMM PROPRIETARY, COMMERCIALY SENSITIVE TRADE SECRET** information.

Pursuant to Sections 0.457(d) and 0.459 of the Commission's Rules, ORBCOMM respectfully requests that the entirety of its Annual Report be accorded confidential treatment by the Commission and withheld from public inspection. The Annual Report contains proprietary trade secret commercially sensitive internal operational information that is not publicly disclosed by ORBCOMM, and thus should be treated as confidential by the Commission. Moreover, disclosure of this information would cause competitive harm to ORBCOMM by providing its competitors with detailed information on the operations of ORBCOMM's satellite system. Thus, ORBCOMM's Annual Report should be exempt from public disclosure pursuant to Section 0.457(d) of the Commission's Rules. Due to the sensitive nature of the information contained in the Annual Report, and out of an abundance of caution, ORBCOMM is also hereby requesting confidential treatment of its Annual Report pursuant to Section 0.459 of the Commission's



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Rules. Accordingly, grant of the instant request to withhold the attached materials from public inspection will serve the public interest, convenience and necessity.

Kindly direct any inquiries concerning this submission to the undersigned.

Very truly yours,



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Vice President, Regulatory Affairs  
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E-Mail: [sonnenfeldt.walter@orbcomm.com](mailto:sonnenfeldt.walter@orbcomm.com)

Attachment: **CONFIDENTIAL** Submission

