



20 October 2015

REF: 47 CFR 25.129 - FCC Earth Station Transceiver Equipment Authorization Rules and Policies  
FCC ID: XGS-ORBCOG2BAM1

Subject: Decision to Proceed With Optional (Allowed) FCC Equipment Certification

Pursuant to 47 CFR Section 25.129, FCC Equipment Certification is required for "portable earth station transceivers" as defined in Section 25.129(b) (*i.e.*, if its radiating structure(s) would be within 20 centimeters of the operator's body when the transceiver is in operation). FCC Equipment Certification is optional (Allowed) for FCC Part 25 earth station transceivers that are not "portable" under the definition set forth in Section 25.129(b). *See, also*, FCC OET KDB 273109 (February 3, 2011). The design and functionality of ORBCOMM's earth station transceiver equipment designated with FCC ID XGS-ORBCOG2BAM1 does not fall within the above-mentioned definition of "portable earth station transceiver".

Based on the foregoing, ORBCOMM has elected to proceed with optional (Allowed) FCC Equipment Certification for the earth station transceiver model designated with FCC ID XGS-ORBCOG2BAM1. Such Certification shall be in accordance with 47 CFR Sections 2.1091, 25.129(c), 25.129(d), 25.136(h), and related sections.

Sincerely,

A handwritten signature in blue ink, appearing to read "Walter H. Sonnenfeldt".

Walter H. Sonnenfeldt  
VP, Regulatory Affairs  
ORBCOMM Inc.

