

FCC Laboratory
7435 Oakland Mills Rd
Columbia MD 21046

Subject: ORBCOMM License Corp. Request for Confidentiality
FCC ID: XGS-DS3

To Whom It May Concern,

Pursuant to Sections 0.457 and 0.459 of Commission's Rules (47CFR§§0.457, 0.459), ORBCOMM License Corp. respectfully requests that the Commission withhold the following documents from public disclosure indefinitely.

- Schematic Diagram
- Block Diagram
- Part List
- Operational Description
- Tune-up Procedure

Each of the above-mentioned documents contain confidential and proprietary equipment and system design and operational information. The public disclosure of any of the above documents might be harmful to our company and could give competitors an unfair advantage in the market.

In addition to above mentioned documents, pursuant to FCC Public Notice DA 04-1705, in order to comply with the Commission's marketing regulations set forth in 47 CFR §2.803 and the importation Rules set forth in 47 CFR §2.1204, while ensuring that business sensitive information remains confidential until the actual marketing of newly authorized devices, we are requesting the Commission to withhold the following documents for 180 days after the grant of equipment authorization is issued:

- External Photos
- Internal Photos
- Test Setup Photos
- User Manual

It is our understanding that all measurement test reports, and the FCC ID label format, cannot be deemed as confidential documents, and that this above-mentioned information will be available for public review once the grant of equipment authorization is issued.

Sincerely yours,



Name: Walter Sonnenfeldt
Title: VP Regulatory Affairs
Email: sonnenfeldt.walter@orbcomm.com
Date: October 16, 2025

