



July 16, 2002

Mr. James Burtle
Chief, Experimental Licensing Branch
Office of Engineering and Technology
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: FCC Form 442 Experimental License Application

Dear Mr. Burtle,

Orbital Imaging Corporation ("ORBIMAGE") hereby submits an application for an experimental license from the Federal Communications Commission (the "Commission") in order to operate the OrbView-2 satellite (formerly called SeaStar) and its related fixed earth station in Fairmont, West Virginia (collectively, the "OrbView-2 system") in the 1702.5 MHz and 2092.5 MHz frequency bands. ORBIMAGE would use the license to fulfill the requirements under its existing United States Government contracts with the National Imagery and Mapping Agency ("NIMA") and the National Oceanic and Atmospheric Administration ("NOAA") and any future contracts it enters into with United States Government agencies.

By way of background, Orbital Sciences Corporation ("Orbital") currently holds an experimental license from the Commission (Call Sign KE2XNL; File Number 0095-EX-RR-1999) to fulfill its requirements under a contract with the National Aeronautics and Space Administration ("NASA"). ORBIMAGE operates the OrbView-2 system to perform the NASA contract on behalf of Orbital. The NASA contract expires December 19, 2002, and the experimental license expires January 1, 2003. ORBIMAGE is seeking to renew the NASA contract in its own name for a multi-year term.

In addition to performing the NASA contract, ORBIMAGE also uses the OrbView-2 system to provide satellite imagery under contract to NIMA and NOAA. The NOAA contract continues in effect until September 14, 2002, and the NIMA contract thru December 31, 2003. The terms of these contracts can be extended by agreement of the parties.

ORBIMAGE is applying for a separate experimental license to ensure uninterrupted service to NIMA and NOAA and any future United States Government agencies with which it contracts. An experimental license is necessary to authorize

ORBIMAGE to operate the OrbView-2 system in the 1702.5 MHz and 2092.5 MHz bands for the purpose of fulfilling its requirements under the NIMA, NOAA and any future United States Government contracts for the term of such contracts.

Please note that the technical parameters of the OrbView-2 system would remain substantially unchanged from those submitted to the Commission in support of Orbital's existing experimental license application and previous renewals for the OrbView-2 system. As a result, ORBIMAGE refers the Commission to the existing OrbView-2 system experimental license and related application where the technical information requested in ORBIMAGE's application is not provided.¹

Thank you for your consideration of this application request, and I look forward to hearing from you. In the meantime, please contact me if I can be of further assistance (703-480-7500).

Sincerely,

Armand D. Mancini
Executive Vice President & Chief Financial Officer

¹ The OrbView-2 system also requires the use of government spectrum in the S-band (2200-2290 MHz band) in order for ORBIMAGE to fulfill the requirements of the NIMA and NOAA contracts. ORBIMAGE separately is pursuing such use with the National Telecommunications and Information Administration.