



DIVISION OF  
CORPORATION FINANCE

UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION  
WASHINGTON, D.C. 20549

March 3, 2020

Christian Le Brun  
Executive Vice President and General Counsel  
ORBCOMM Inc.  
395 W. Passaic Street  
Rochelle Park, NJ 07662

**Re: ORBCOMM Inc.**  
**Registration Statement on Form S-3**  
**Filed March 2, 2020**  
**File No. 333-236833**

Dear Mr. Le Brun:

This is to advise you that we have not reviewed and will not review your registration statement.

Please refer to Rules 460 and 461 regarding requests for acceleration. We remind you that the company and its management are responsible for the accuracy and adequacy of their disclosures, notwithstanding any review, comments, action or absence of action by the staff.

Please contact Kathleen Krebs, Special Counsel, at 202-551-3350 with any questions.

Sincerely,

Division of Corporation Finance  
Office of Technology