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October 5, 2018

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: *WiMAX Forum Petition Proposing Rules for the Aeronautical Mobile
Airport Communication System, RM-11793*

Dear Ms. Dortch:

On October 3, 2018, Declan Byrne of the WiMAX Forum, Mike Dalton and Joel Green of Siemens USA, Leonhard Korowajczuk and Eliani Fritsch Korowajczuk of CelPlan Technologies, Inc., Andrea Walter Isoldo of Leonardo, and the undersigned of Wilkinson Barker Knaauer, LLP, counsel to the WiMAX Forum (collectively, the “Parties”), met with Rachael Bender, Wireless Advisor to Chairman Ajit Pai, to discuss the above-listed proceeding.

The Parties described the momentum that continues to build for AeroMACS, including recent deployments in China, Portugal, and Brazil. In China, for example, three airlines are currently using AeroMACS in the cockpit, and Aviation Data Communications Corporation recently announced plans to connect thirty Chinese airports with AeroMACS by 2019. The Parties stressed that the prompt issuance of a Notice of Proposed Rulemaking proposing AeroMACS service rules will help ensure that the AeroMACS ecosystem in the United States develops on a timeline consistent with that of other countries.

The Parties also explained how AeroMACS will improve public safety at and around airports throughout the United States. Specifically, AeroMACS will support critical air traffic control messages over a secure network; enable the transmission to pilots of up-to-date information on flight plans, maps, and weather forecasts; be used by fire rescue, snow removal, and ground personnel to coordinate operations at airports; and allow airport security personnel to monitor live video feeds. In addition, AeroMACS networks could enable solutions that prevent unauthorized operation of planes and access to secure areas within an airport. These types of solutions, using secure AeroMACS networks, potentially could help to prevent incidents like the

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one that occurred in August at the Seattle-Tacoma International Airport.¹ The Parties stressed that the safety benefits enabled by AeroMACS networks cannot be realized until the Commission adopts AeroMACS service rules.

The Parties also explained how AeroMACS will benefit U.S. air travelers by promoting on-time flight performance. The Parties noted that AeroMACS will allow airport operations teams to increase efficiencies in performing a host of tasks, ranging from coordinating gate operations to snow removal to support for emergency services. The Parties explained that trials in China's Chengdu airport found that air traffic control procedures using AeroMACS reduced clearance delivery times by twenty minutes per flight.² These results indicate that AeroMACS can help airlines and airports minimize flight delays for U.S. air travelers.

Pursuant to the Commission's rules, this notice is being filed in the above-reference docket for inclusion in the public record. Please contact me should you have any questions.

Sincerely,

/s/
Sean T. Conway

cc: Rachael Bender, Wireless Advisor to Chairman Ajit Pai

¹ See, Andy Pasztor & Andrew Tangel, *Stolen Horizon Air Plane Believed Deliberately Crashed*, WALL ST. J., Aug. 20, 2018, <https://www.wsj.com/articles/stolen-horizon-air-plane-believed-deliberately-crashedsources-1534808847>.

² See, Aloke Roy, *AeroMACS: It's like a Real-time GPS, but Better!*, Honeywell (May 23, 2016), <https://aerospace.honeywell.com/en/blogs/2016/may/aeromacs-it-is-like-a-real-time-gps-but-better>.