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January 8, 2018

Ms. Marlene S. Dortch
Secretary
Federal Communications Commission
445 12th Street S.W.
Room 2-B450
Washington, DC 20554

**Re: Ex Parte Filing
RM - 11793**

Dear Ms. Dortch:

This is with reference to the ex parte filing by the WiMax Forum dated December 18.¹

In its letter the Forum mentions ongoing discussions with the aeronautical mobile telemetry ("AMT") community regarding the definition of compatibility techniques between AMT operations, on the one hand, and AeroMACS operations, on the other hand, in the band 5091-5150 MHz (the "Band").

The letter states that there is an absence of AMT operations in the Band based on a review of Universal Licensing System data, as well as an absence of standardized AMT equipment. From this, the letter suggests that the AMT community has a "greenfield opportunity" to tailor its specifications. The record needs to be completed, if not corrected, in these respects.

First, it is not correct to suggest that there are no AMT operations in the Band. On the contrary, the Commission has issued a number of experimental licenses for the Band to Member Companies of the Aerospace and Flight Test Radio Coordinating Council, Inc. ("AFTRCC"),

¹ Letter from Sean T. Conway, counsel to WiMax Forum, to Marlene H. Dortch, Secretary, Federal Communications Commission.

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and operations are planned or are being conducted pursuant to those authorizations. These include, for example, The Boeing Company, Raytheon Company, and Textron Aviation.

Second, and more important, equipment used in AMT operations is built to published standards. IRIG-106, available on the web, contains nearly 500 pages of well-established standards for AMT systems and equipment. As noted in Section 2.1 thereof:

“These standards provide the criteria to determine equipment and frequency use requirements and are intended to ensure efficient and interference-free use of the radio frequency spectrum. These standards also provide a common framework for sharing data and providing support for test operations between ranges.”

http://www.irig106.org/docs/106-17/106-17_Telemetry_Standards.pdf. IRIG-106 has governed AMT equipment for many years. To the extent the Forum has standards in mind in addition to these, and they are practical, AFTRCC is prepared to consider them in the context of the on-going technical discussions among the parties.

Any questions regarding this filing may be directed to the undersigned.

Respectfully submitted,



William K. Keane

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