Before the

**FEDERAL COMMUNICATIONS COMMISSION**

Washington, DC 20554

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| In the Matter of  Expanding Flexible Use in Mid Band Spectrum Between 3.7 and 24 GHz | )  )  )  ) | GN Docket No. 17-183 |

To: The Commission

**COMMENTS OF**

**ZODIAC INFLIGHT INNOVATIONS**

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Following Zodiac Inflight Innovations (Zii) previous submittal of comments to this NOI other aviation industry participants voiced concern that a statement in Zii’s submittal might be misconstrued. These comments are intended to clarify our original submittal.

The use of Dynamic Frequency Selection (DFS) and Transmit Power Control (TPC) in the 5 GHz band effectively protects ground-based radar systems from interference as clearly demonstrated by The Boeing Company and Environment Canada in their report “Airborne RLAN and Weather Radar Interference a C Band.”

Zii’s statement regarding the unpredictable availability of channels in the 5.130-5.730 GHz frequency range for RLAN use on aircraft is true specifically because of the protections offered to radar systems by the DFS and TPC functions. RLAN services in the 5.130-5.730 GHz frequency range reliably switch frequencies whenever ground-based radar signals are detected. Once a radar has been detected the RLAN cannot reuse the channel in which radar was detected for thirty minutes. It is this intended functionality that makes the use of DFS channels unpredictable for delivery of streaming content on aircraft.

RLAN spectrum is limited on aircraft because DFS channels are not usable.

Zii notes that CEPT has just initiated SE25 to evaluate the 5.925 – 6.425 GHz frequency range for RLAN use.

Zii encourages the FCC to consider reallocation of the frequency ranges of 5.925 – 6.425 GHz and 6.425 – 7.125 GHz for unlicensed use by short range devices on aircraft in support of the aviation industry and the traveling public.