

**Before the
Federal Communications Commission
Washington, DC 20554**

In the Matter of)	
)	
International Bureau Seeks Comment on)	IB Docket No. 16-185
Recommendations Approved by World)	
Radiocommunication Conference 2019)	
Advisory Committee)	

COMMENTS OF AVIATION SPECTRUM RESOURCES, INC.

Aviation Spectrum Resources, Inc. (“ASRI”) submits these comments in response to the Public Notice issued by the Federal Communications Commission (“Commission”) on March 11, 2019 in the above captioned proceeding.¹

ASRI is the communications company of the US commercial aviation industry and is owned by the US airlines and other airspace users. As sponsor of the US Aeronautical Frequency Committee (“AFC”), ASRI brings together expertise and opinions from across the US aviation sector to promote the safe and effective operation of commercial aviation radio communications and navigation systems in use within the US and overseas.² As discussed herein, ASRI urges the Commission to:

- A. Support Document WAC/081 as a future WRC agenda item for Aeronautical Wideband HF (“Wideband HF”)
- B. Oppose Document WAC/085 as a future WRC agenda item for Electronic News Gathering (“ENG”).

¹ See FCC Public Notice, International Bureau Seeks Comment on Recommendations Approved by World Radiocommunication Conference Advisory Committee. <https://docs.fcc.gov/public/attachments/DA-19-172A1.pdf> IB Docket No. 16-185, DA 19-172 (rel. Mar. 11, 2019)

² The AFC includes the following members: Airlines for America, Alaska Airlines, ALPA, American Airlines, AOPA, ASRI, Boeing Corporation, Bristow Helicopters, Chevron, Collins Aerospace, Delta Airlines, Era Helicopters, Federal Aviation Administration, Federal Express, Frontier Airlines, Harris Corporation, Helicopter Association International, Helicopter Safety Advisory Conference, International Air Transport Association, JetBlue Airways, National Air Transportation Association, PHI, Inc., Societe Internationale de Telecommunications Aeronautique, Southwest Airlines, United Airlines, and United Parcel Service.

I. AERONAUTICAL WIDEBAND HF - DOCUMENT WAC/081 (11.03.19)

ASRI supports Document WAC/081 concerning a proposed future WRC agenda item for Wideband HF. Aeronautical HF voice and data are the current primary means for long-range aircraft communications to oceanic and remote areas. While SATCOM systems are becoming more common for high data rate applications, HF is still used by many aircraft and national aviation authorities to achieve communications for Air Traffic Control (“ATC”). HF communications are also truly global, allowing the servicing of polar aircraft routes that GSO SATCOM cannot support. Therefore, improved HF datalinks would benefit all aircraft operators, and ultimately a safe and efficient aviation industry.

The Wideband HF proposal only considers a new system within existing AM(R)S allocations, without any changes to Article V. It was for these above reasons that the Wideband HF proposal received general support at IWG-1. Therefore, ASRI supports the adoption of the proposal for Wideband HF as described in Document WAC/081.

II. ELECTRONIC NEWS GATHERING - DOCUMENT WAC/085 (11.03.19)

ASRI wishes to raise its objections to Document WAC/085 concerning a new allocation for worldwide harmonization of ENG. The proposal covers an extremely broad range of frequencies and services, creating multiple concerns across a number of interests – including commercial, public, and Federal users within the 150 MHz to 2 000 MHz range. These multitude of affected services would be subject to extensive assessment and review under this proposed agenda item, while still leaving the possibility of harmful interference from co-frequency or in some cases adjacent-frequency ENG operations. For these reasons, there was an overwhelming level of concern and opposition from many IWG-2 participants regarding the submission of this wireless microphone/ENG proposal as a future agenda item. For these reasons, ASRI cannot support the proposal for ENG as described in Document WAC/085.

III. CONCLUSION

For the reasons provided herein, ASRI urges the adoption of Document WAC/081 for the proposal of Aeronautical Wideband HF, but opposes the adoption of Document WAC/05 for the proposal of ENG harmonization.

Respectfully submitted,

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