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April 13, 2017

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 April 11, 2017, Declan Byrne, President of the WiMAX Forum (“Forum”), and Paul Sinderbrand and the undersigned of Wilkinson Barker Knauer, LLP, counsel to the Forum, met separately with Erin McGrath, Legal Advisor to Commissioner Mike O’Rielly, Will Adams, Legal Advisor to Commissioner Brendan Carr, and Umair Javed, Legal Advisor to Commissioner Jessica Rosenworcel, to discuss the above-listed proceeding.

During the meetings, the Forum stressed the importance of the prompt issuance of a Notice of Proposed Rulemaking proposing service rules for AeroMACS. The Forum noted that the International Telecommunications Union laid the groundwork for the global harmonization of AeroMACS when it added an AeroMACS allocation more than a decade ago, and the Commission in turn has adopted two allocations for AeroMACS. The Forum further summarized the technical standards for AeroMACS that have been adopted by the relevant global standards organizations. The Forum noted that the lack of service rules for AeroMACS presently serves as the main barrier to the widespread commercial deployment of AeroMACS in the United States.

The Forum also explained how AeroMACS will improve safety and on-time flight performance at airports throughout the United States. With respect to safety, the Forum described how 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.

Marlene Dortch
April 13, 2017
Page 2

The Forum also explained how AeroMACS will benefit U.S. air travelers by promoting on-time flight performance. The Forum 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 Forum explained that AeroMACS trials in China's Chengdu airport found that air traffic control procedures using AeroMACS reduced clearance delivery times by twenty minutes per flight.¹ These results indicate that AeroMACS can help airlines and airports minimize flight delays for U.S. air travelers. Moreover, the Forum explained that these efficiencies will help reduce the environmental impact of flying.

The Forum also described the momentum that continues to build for AeroMACS internationally. In particular, the Forum noted that three Chinese airlines are currently using AeroMACS in the cockpit, and that Aviation Data Communications Corporation of China recently announced plans to connect thirty airports in China with AeroMACS by 2019. The Forum stressed that the prompt issuance of a Notice of Proposed Rulemaking will help ensure that U.S. air passengers will be able to enjoy the benefits of AeroMACS on a timeline consistent with that of airline passengers in other countries.

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: Erin McGrath, Legal Advisor to Commissioner Mike O'Rielly
Will Adams, Legal Advisor to Commissioner Brendan Carr
Umair Javed, Legal Advisor to Commissioner Jessica Rosenworcel

¹ See, Alope 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>.