

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Amendment of Parts 1, 2, 22, 24, 27, 90 and 95)	
of the Commission's Rules to Improve Wireless)	WT Docket No. 10-4
Coverage Through Use of Signal Boosters)	

To: The Commission

**COMMENTS OF AEROSPACE AND FLIGHT
TEST RADIO COORDINATING COUNCIL, INC.**

Aerospace and Flight Test Radio Coordinating Council, Inc. ("AFTRCC"), by its counsel, hereby submits its Comments on the Second Further Notice of Proposed Rulemaking, FCC 18-30 (hereinafter, the "Notice") in the above-captioned proceeding. In particular, AFTRCC wishes to register its concern regarding possible use of the 2345-2360 MHz band for consumer boosters.

INTRODUCTION

AFTRCC is an association of the nation's principal aerospace manufacturers (see Attachment). AFTRCC was founded in 1954 to serve as an advocate for the aerospace industry on matters affecting spectrum policy, and it serves as the recognized non-Federal Government coordinator for the shared, Government/Non-Government spectrum allocated for flight testing. AFTRCC is the FCC-designated AMT coordinator for secondary medical body area network use of the aeronautical mobile telemetry ("AMT") spectrum at 2360-2390 MHz,¹ and is responsible

¹ *In the Matter of Amendment of the Commission's Rules to Provide Spectrum for the Operation of Medical Body Area Networks, First Report and Order*, FCC 12-54, 27 FCC Rcd 6422 at para. 74 (2012).

for coordination with Wireless Communications Services (“WCS”) licensees in the adjacent, 2345-2360 MHz band.² Most recently, AFTRCC was designated to coordinate secondary wireless microphone use of the 1435-1525 MHz AMT band.³ AFTRCC works closely with Government Area Frequency Coordinators, who are responsible for Federal Government use of the spectrum, in an effort to ensure that interference-free flight test operations are protected, and flight safety is maximized.

DISCUSSION

The Notice invites comment on whether consumer boosters should be allowed use of a number of additional bands, including 2345-2360 MHz. Among other things, the Commission observes that consideration must be given to whether booster use might harm users in adjacent bands, it being further understood that any such use would require wireless carrier consent to booster use in the band. Notice, at paras. 21-22.

As the Commission is aware from the extensive record developed in WT Docket No. 07-293, the 2360-2390 MHz band is a flight safety band used for manned aircraft flight testing. It was for this reason that the Commission adopted an out-of-band roll-off limit for WCS at the band edge which is tighter than the normal $43+10 \log (P)$, and also required that AFTRCC facilitate coordination with adjacent WCS operators.⁴ In furtherance of this mandate, AFTRCC concluded a Coordination Agreement with AT&T in 2015. Since then, AFTRCC has coordinated tens of thousands of WCS base stations using its proprietary software in

² Rule 27.73(a).

³ Rule 74.803(d).

⁴ See Rule 27.53(a)(1)(iii); Rule 27.73.

collaboration with AT&T, coordinations which have been effected in consultation with DOD Area Frequency Coordinators.

Adoption of the 2345-2360 MHz proposal raises the specter that many thousands of consumer boosters could start operating in a band adjacent to 2360-2390 MHz. Allowing consumer boosters in the band would risk undoing the careful coordination regime which AFTRCC and AT&T have been able to establish. The reason is simple: AFTRCC is unaware of any effective means of coordinating consumer boosters to ensure flight test operations in the adjacent band would not experience harmful interference. These concerns are especially acute in the case of mobile boosters. As the Commission observes, mobile operations are permitted only in 2350-2360 MHz, which is the spectrum most immediately adjacent to flight test spectrum. *Id.* at note 54. Mobile boosters in this spectrum would be the most likely to cause harmful interference to flight test telemetry given the lack of effective coordination.

Given these factors, AFTRCC is also of the view that there is more than ample reason for WCS carriers and, in particular, the principal WCS carrier, AT&T, to withhold their consent to consumer booster use in 2345-2360 MHz.⁵

⁵ See *id.* at note 50 (“the consent of wireless provider licensees is a fundamental underpinning of the rules and a necessity for the operation of Consumer Signal Boosters”).

CONCLUSION

For the foregoing reasons, AFTRCC opposes use of the band 2345-2360 MHz, or portions thereof, for consumer boosters.

Respectfully submitted,

AEROSPACE AND FLIGHT TEST RADIO
COORDINATING COUNCIL, INC.

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