

May 31, 2019

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW, Room TW-A325
Washington, DC 20554

Re: *Amendment of the Commission's Rules to Promote Aviation Safety, Notice
of Proposed Rulemaking, WT Docket No. 19-140*

Dear Ms. Dortch:

Pursuant to Section 1.1206 of the Federal Communications Commission's ("Commission") rules,¹ this letter provides notice that on May 29, 2019, the undersigned spoke by telephone with Umair Javed, Wireless & International Advisor to Commissioner Jessica Rosenworcel, on behalf of Iridium Communications Inc. ("Iridium") regarding the Commission's draft Notice of Proposed Rulemaking in the above-captioned proceeding. During this call, Iridium discussed its partnership with Aireon LLC ("Aireon") and the importance of space-based Automatic Dependent Surveillance-Broadcast ("ADS-B"). Iridium's second-generation satellite constellation hosts the AireonSM aircraft tracking data service to provide a global air traffic surveillance service through a series of ADS-B receivers on the Iridium NEXT satellites. The space-based Aireon System complements terrestrial ADS-B systems worldwide by expanding their reach to provide global aircraft surveillance coverage specifically over the oceans, the poles, and other remote regions by using space-based ADS-B receiver payloads hosted on each of the Iridium NEXT satellites.

ADS-B technology plays a key role in next generation air traffic control modernization. ADS-B enhances surveillance accuracy by automatically broadcasting GPS-derived data to space-based ADS-B receivers in the 1090 MHz frequency to Iridium's satellites, then from Iridium's satellites to ground stations and on to air traffic controllers. Space-based ADS-B has filled the substantial global gaps in ground-based radar surveillance thereby significantly enhancing safety and operational efficiency, as well as providing time-critical data to better inform accident investigations. As of January 1, 2020, pursuant to a U.S. mandate, virtually all aircraft must be able to transmit ADS-B information to fly in most controlled airspace. Other countries have similar mandates going into force with varying deadlines.

¹ 47 C.F.R. § 1.1206.

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By way of background, Iridium initially formed Aireon in 2011. Aireon subsequently became a joint venture from subsequent investments from the air navigation service providers (“ANSPs”) of Canada, Italy, Denmark, Ireland, and the United Kingdom. Aireon has currently contracted to provide the service to eleven ANSPs representing 28 countries and plans to offer the service to other customers worldwide, including the FAA. Aireon will also offer its free, global Aireon Aircraft Locating and Emergency Response Tracking (“Aireon ALERT”) service. The Aireon ALERT service will provide ANSPs, aircraft operators, regulators, and search and rescue organizations with the last known position of aircraft equipped with ADS-B that are in apparent distress or experiencing a loss of communication.

Please direct any questions concerning this submission to the undersigned.

Respectfully Submitted,

/s/ Bryan N. Tramont
Bryan N. Tramont
Counsel to Iridium Communications Inc.

Attachment

cc: Umair Javed