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June 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 June 12, 2017, the undersigned of Wilkinson Barker Knauer, LLP, counsel to the WiMAX Forum, spoke by telephone to Rachael Bender, Legal Advisor to Chairman Ajit Pai, to discuss the above-listed proceeding.

During the phone call, I stressed the importance of the prompt issuance of a Notice of Proposed Rulemaking proposing service rules for AeroMACS, which is an emerging wireless communications service that operates in the airport surface domain and which was developed to provide broadband wireless communications between aircraft, ground vehicles, and critical fixed assets. I noted that the International Telecommunications Union added an AeroMACS allocation more than a decade ago, and the Commission in turn has adopted two allocations for AeroMACS. I explained that the lack of services rules for AeroMACS presently serves as the main barrier to the widespread commercial deployment of this service in the United States.

I further explained how AeroMACS will facilitate improvements in on-time flight performance. I noted that trials in China's Chengdu airport found that air traffic control procedures using AeroMACS reduced clearance delivery times by twenty minutes per flight and substantially improved operating efficiency of the air traffic control tower.¹ These results indicate that AeroMACS can help airlines and airports minimize flight delays for U.S. air travelers. I also noted that AeroMACS will improve safety at airports by allowing for the delivery of critical air traffic control messages over a secure communications network.

¹ See, Aloke 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>

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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

Sean T. Conway

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Counsel for the WiMAX Forum

cc: Rachael Bender, Legal Advisor to Chairman Ajit Pai
Don Stockdale, Chief, Wireless Telecommunications Bureau
Dana Shaffer, Deputy Chief, Wireless Telecommunications Bureau
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