

**American  
Meteorological  
Society**

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15 June 2018

Federal Communications Commission  
Ms. Marlene Dortch, Secretary  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

**RE: GN Docket No. 18-122, Reply Comments**

Dear Ms. Dortch:

The American Meteorological Society (AMS), in joint comments with the American Geophysical Union and National Weather Association, urged pause, consideration, and protection for the weather information relay known as NOAAPort in its previous filing to this docket<sup>1</sup>. We supplement that filing to highlight and join the concerns of American airlines, air transporters, and their representative associations with respect to preserving weather data access.

The National Oceanic and Atmospheric Administration (NOAA) operates NOAAPort through a commercial satellite provider to share weather information with government, academic, and industry users who provide weather forecasts and conduct weather research for the American public and weather-sensitive businesses. NOAAPort is a C-band data service to users with receive-only antennas.

The potential for sharing 3.7 GHz to 4.2 GHz band with licensed or unlicensed commercial wireless users is concerning because there are no other reliable methods for the transmission of timely weather data and urgent bulletins to a large number of geographically diverse users at the data rate required. Support for this concern is found in the comments from other filers in the docket.

In reviewing the submissions to this docket from American airlines, air transporters, and their representative associations, the importance of uninterrupted weather information to inform safe flight routing decisions is evident. Specifically, the Aerospace Industries Association (AIA)<sup>2</sup>, Airlines for America (A4A)<sup>3</sup>, Aviation Spectrum Resources, Inc. (ASRI)<sup>4</sup>, Delta Air Lines, Inc. (“Delta”)<sup>5</sup>, International Air Transport Association (IATA)<sup>6</sup>, and United Parcel Service (UPS)<sup>7</sup>

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<sup>1</sup> See Comment, American Meteorological Society, American Geophysical Union, and National Weather Association, GN Docket No. 18-122, filed 31 May 2018.

<sup>2</sup> See Comment, Aerospace Industries Association, GN Docket No. 18-122, filed 31 May 2018.

<sup>3</sup> See Comment, Airlines for America, GN Docket No. 18-122, filed 31 May 2018.

<sup>4</sup> See Comment, Aviation Spectrum Resource, Inc., GN Docket No. 18-122, filed 31 May 2018.

<sup>5</sup> See Comment, Delta Air Lines, Inc., GN Docket No. 18-122, filed 31 May 2018.

submitted filings attesting to the value of NOAAPort and/or NOAA weather data to ensure the safety of the flying public and uninterrupted commerce.

The AMS is nation's premier scientific and professional organization promoting and disseminating information about the atmospheric, oceanic, hydrologic sciences, with 13,000 members, including scientists, researchers, educators, broadcast meteorologists, and other professionals in the fields of weather, water, and climate. We agree with the other filers that the NOAAPort transmission is necessary for reliable weather information. We concur with UPS that that "this incumbent use must be protected"<sup>8</sup>.



**A National Weather Service (NWS) meteorologist in Honolulu, Hawaii, reviews weather data from NOAAPort in the Advanced Weather Interactive Processing System (AWIPS) while coordinating with emergency response partners via telephone in June 2018**

While safety is paramount to aviation, every American who benefits from a weather forecast or takes action following a severe weather warning disseminated through a federal, state, or local government agency or commercial weather information provider relies indirectly on the quality and timeliness of the NOAAPort data service. The NOAA Weather Wire Service (NWWS),

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<sup>6</sup> See Comment, International Air Transport Association, GN Docket No. 18-122, filed 31 May 2018.

<sup>7</sup> See Comment, United Parcel Service, GN Docket No. 18-122, filed 31 May 2018.

<sup>8</sup> *Ibid.*

which uses NOAAPort to transmit bulletins from the National Weather Service (NWS), is the “fastest method to disseminate and receive weather information”<sup>9</sup>.

We appreciate your caution and awareness of this issue and potential impact to America’s weather enterprise in and around 4040 MHz as you proceed with assessing whether the 3.7 GHz to 4.2 GHz band is suitable to open for licensed or unlicensed commercial wireless users.

Sincerely,

American Meteorological Society<sup>10</sup>

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<sup>9</sup> See <http://www.nws.noaa.gov/nwws/#Description>, accessed 14 June 2018.

<sup>10</sup> To address the American Meteorological Society (AMS) on this matter, contact Keith Seitter, Executive Director, or Paul Higgins, Director of the AMS Policy Program.