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July 2, 2018

Via ECFS

Ms. Marlene S. Dortch
Secretary
Federal Communications Commission
445 12th Street S.W.
Room 2-B450
Washington, DC 20554

**Re: Ex Parte Filing
RM-11793**

Dear Ms. Dortch:

This is to reflect that on June 28, representatives of the Aerospace Industries Association ("AIA"), Aerospace and Flight Test Radio Coordinating Council, Inc. ("AFTRCC"), The Boeing Company, Lockheed Martin Corporation, Raytheon Company, and Textron Inc. met with Rachael Bender, Chairman Pai's wireless advisor; Erin McGrath, Commissioner O'Rielly's wireless advisor; Will Adams, Commissioner Carr's legal advisor; Umair Javed, Commissioner Rosenworcel's wireless advisor; and the following staff of the Wireless Telecommunications Bureau: Charles Mathias, Associate Bureau Chief; Aalok Mehta, Senior Policy Advisor; Scot Stone, Deputy Chief, Mobility Division; Linda Chang, Associate Chief, Mobility Division; and Tim Maguire, Senior Electronics Engineer, Mobility Division, regarding the above-referenced proceeding. The representatives of the aerospace associations and companies at each meeting are listed in the Attachment and are referred to collectively herein as the "Aerospace Representatives."

The Aerospace Representatives stressed the importance of access to the 5091-5150 MHz band for the aerospace and defense industry. They noted the extraordinary growth in the amount of data collected during flight tests (e.g., from a few hundred data points for the Boeing 707 in the late 1950s, to over 100,000 data points for the Boeing 777 in the 1990s), growth which continues to this day, combined with the loss of other spectrum which had been available for telemetry. These changes in need and available spectrum were drivers in the successful effort by the United States to secure additional spectrum for aeronautical mobile telemetry ("AMT") at the

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2007 World Radiocommunication Conference. The allocation was implemented by the Commission in a 2015 Report and Order in ET Dockets No. 12-338 and 15-99.

Access to the 5091-5150 MHz band is important for civil and military flight test programs, and will help the U.S. maintain its long leadership in the global aerospace marketplace. In the 2015 Report and Order, the Commission, after making co-primary allocations in the entire band to both the aeronautical mobile (route) service ("AM(R)S") "reserved for communications relating to safety and regularity of flight" and AMT. The Commission granted priority to the former application, but "urged" operators of AM(R)S and AMT to "cooperate with each other and exchange information about planned deployments of their respective systems," with the expectation that "[s]uch cooperation will enhance the prospects for compatible sharing of the band."

Toward this goal of cooperation to enhance prospects for compatible sharing, the Aerospace Representatives advised that the organizations they represent desire to conduct field tests between AMT and AM(R)S in the band with the advocates for Aeronautical Mobile Airport Communications Systems ("AeroMACS"). Such field tests will complement the modeling efforts the AeroMACS and AMT parties have undertaken to date and will help determine whether AMT and AeroMACS are compatible from both a co- and adjacent-channel perspective. In this regard, the Aerospace Representatives advised that, while the AMT community is prepared to complete modeling with the AeroMACS parties, the AMT companies they represent are not prepared to invest the many millions of dollars required to instrument the 5091-5150 MHz band without real-world compatibility testing with AeroMACS equipment and involving the AeroMACS parties. They further noted that, while the testing need not delay the Commission moving forward with any notice of proposed rulemaking that the Commission might otherwise see fit to issue, the results of such tests would be helpful to the Commission in promulgating AeroMACS rules that accommodate deployments of the two co-primary services and for the guidance of any Channel Manager (or Managers) in carrying out its (or their) responsibilities.


However, the Aerospace Representatives also observed that the most effective way to balance the needs of AMT and AeroMACS and for AMT to protect AeroMACS at the small number of airports co-located with aerospace plants, with perhaps one exception (Tucson), is via dedication of a few of the 16 channels available to AMT.

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This letter is being submitted electronically as required by Section 1.1206 of the Commission's Rules.

Respectfully submitted,



Edward A. Yorkgitis, Jr.

Counsel for Raytheon Company

cc: Rachael Bender
Erin McGrath
Will Adams
Umair Javed
Charles Mathias
Aalok Mehta
Scot Stone
Linda Chang
Tim Maguire

Attachment

Attendees at June 28, 2018, Meetings (RM-11793)

Meeting with Rachael Bender

Leslie Riegle, Assistant Vice President, Civil Aviation, AIA
William K. Keane, Duane Morris LLP, counsel for AFTRCC
Kim Kolb, Regulatory & Spectrum Management Engineer, The Boeing Company
Joseph Cramer, Regional Director, The Boeing Company*
Daniel McNeil, The Boeing Company and AFTRCC President*
Ryan Terry, Director, Regulatory Licensing and Policy, Trade & Regulatory Affairs,
Lockheed Martin Corporation
Chip Yorkgitis, Kelley Drye & Warren LLP, counsel for Raytheon Company*
Marc Ehudin, Director, Washington Operations, Textron Inc.
Dan Hankins, Senior Spectrum Manager for Textron and former AFTRCC President*

Meeting with Erin McGrath

William K. Keane
Kim Kolb
Joseph Cramer*
Daniel McNeil*
Ryan Terry
Chip Yorkgitis
Marc Ehudin
Dan Hankins*

Meeting with Will Adams

William K. Keane
Kim Kolb
Joseph Cramer*
Daniel McNeil*
Chip Yorkgitis
Marc Ehudin
Dan Hankins*

* Participated by telephone

Meeting with Umair Javed

Leslie Riegle
William K. Keane
Kim Kolb
Joseph Cramer*
Daniel McNeil*
Ryan Terry
Chip Yorkgitis*
Marc Ehudin
Dan Hankins*

Meeting with staff of the Wireless Telecommunications Bureau

William K. Keane
Kim Kolb
Joseph Cramer*
Daniel McNeil*
Ryan Terry
Chip Yorkgitis
Marc Ehudin
Dan Hankins*

* Participated by telephone