

July 17, 2019

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VIA ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Aeronet Global Communications Inc.'s Petition for Rulemaking to Amend The Commission's Allocation and Service Rules For the 71-76 GHz, 81-86 GHz, and 92-95 GHz Bands to Authorize Aviation Scheduled Dynamic Datalinks, RM-11824; Aeronet Global Communications Inc.'s Petition for Rulemaking to Amend The Commission's Allocation and Service Rules For the 71-76 GHz, 81-86 GHz, and 92-95 GHz Bands to Authorize Maritime Scheduled Dynamic Datalinks, RM-11825

Dear Ms. Dortch:

On July 16, 2019, the undersigned, along with Brian Russell, Chief Operating Officer of Aeronet Global Communications Inc. ("Aeronet") and Chris Helzer, Helzer Consulting, LLC (via phone bridge), met with Blaise Scinto, Stephen Buenzow, Peter Daronco, Kenneth Baker, C. Sean Spivey, Lauren Earley and Joel Taubenblatt of the Wireless Telecommunications Bureau, as well as Brian Butler and Michael Ha of the Office of Engineering and Technology to discuss Aeronet's Petitions for Rulemaking in the above-captioned dockets.¹

During our discussion we emphasized the benefits of Aeronet's proposed service for consumers and provided information about Aeronet's ongoing trial of the service on a cruise ship in Florida. Mr. Russell and Mr. Helzer also shared details and answered questions about a previously submitted study of Aeronet's proposal prepared by Comsearch.²

We also described outreach efforts by Aeronet to consult with other commenters to address potential concerns about Aeronet's operations and emphasized that the company is committed fully to a coordination process that does not preclude new, innovative, and competitive E-band uses alongside

¹ See *In re Aeronet Global Communications Inc.'s Petition for Rulemaking to Amend the Commission's Allocation and Service Rules for the 71-76 GHz, 81-86 GHz, and 92-95 GHz Bands to Authorize Aviation Scheduled Dynamic Datalinks*, Petition for Rulemaking of Aeronet Global Communications Inc., RM-11824, at 4-33 (Feb. 6, 2019); *In re Aeronet Global Communications Inc.'s Petition for Rulemaking to Amend the Commission's Allocation and Service Rules for the 71-76 GHz, 81-86 GHz, and 92-95 GHz Bands to Authorize Maritime Scheduled Dynamic Datalinks*, Petition for Rulemaking of Aeronet Global Communications Inc., RM-11825, at 4-32 (Feb. 6, 2019).

² See Letter from Samuel L. Feder, Counsel for Aeronet Global Communications Inc. to Marlene H. Dortch, Secretary, FCC, RM-11824, RM-11825 (May 10, 2019); see also *id.* at Att. A, Comsearch, *Aeronet Aviation and Maritime Communications Systems* (May 2, 2019).

Aeronet's system. Aeronet expressed its view that this coordination process would be straightforward and could fit well within the existing Part 101 rules.

Accordingly, we urged the Commission to move forward expeditiously with a Notice of Proposed Rulemaking that would allow Aeronet to commence offering its innovative maritime and aviation services.

Please contact me if you have any questions.

Sincerely,

/s/ Roger C. Sherman

Roger C. Sherman
Counsel for Aeronet Global Communications Inc.

cc: Blaise Scinto
Stephen Buenzow
Peter Daronco
Kenneth Baker
C. Sean Spivey
Lauren Earley
Joel Taubenblatt
Brian Butler
Michael Ha