

SITA OnAir Switzerland Sarl
Avenue Louis-Casai 71
P.O. Box 42
1216 Cointrin
Geneva
SwitzerlandThe Honorable Ajit Pai
Chairman
Federal Communications Commission
445 12th Street S.W.
Washington, DC 2055414th July 2017

Dear Chairman Pai

Re: Ligado Networks proposed ancillary terrestrial component

I am writing to you in relation to Ligado Networks' proposed ancillary terrestrial component and the potential interference it could present to services SITAONAIR currently provides over satellite communication networks both globally and in North America.

SITAONAIR is a communications service provider to the air transport industry. Indeed, we are entirely owned by the industry, the membership of the SITA Group (www.sita.aero) being 400-plus active members from across the air transport community including many US registered airlines. The airline representative body, the SITA Council, includes executives from American Airlines, Jet Blue and United Parcel Service. SITAONAIR (www.sitaonair.aero), the aircraft business of the SITA Group, provides cockpit communications to our airline customers for *Air Traffic Services* (for example, for air navigation and surveillance purposes) and *Airline Operation and Administrative Communications* (for example, Aircraft and Engine Health Monitoring). Today, we serve approximately 250 airline customers operating over 16,000 aircraft worldwide. Our services run over Very High Frequency (VHF) analogue and digital (VDL) networks, as well as over Inmarsat and Iridium L-Band satellite networks. The SITA Group has been at the forefront of both *Air Traffic Services* provision and *Airline Operation and Administrative Communications* provision for many decades.

Due to the critical nature of the services SITAONAIR provides over Inmarsat frequencies (between 1525 and 1646.5 MHz) and Iridium frequencies (between 1616 and 1626.5 MHz), I thought it appropriate to write to you directly. That said, I should also mention that we have also received several enquiries from our airline customers (including those based in the United States), and collectively from Airlines for America, raising serious concerns as to the potential interference to aeronautical satellite communications services caused by the proposed Ligado Networks' terrestrial emissions in the 1525-1555 MHz band.

While I am of course confident that the FCC will approach its assessment into the Ligado Networks' proposal in a diligent and thorough manner, I would like to highlight two main areas of concern for us and our airline customers:

i. Continuity of existing aircraft communications services

The services we currently provide over both Inmarsat and Iridium satellite networks are essential to both the efficient operation of our airline customers, but also for Air Traffic Services communications designed to ensure

the safe management of air space. It is very important that these services are not degraded or disrupted as part of the Ligado Networks proposal, and that full service continuity is maintained.

ii. Financial impact

Our airline customers are particularly concerned that that if the only effective way to mitigate Ligado emissions is to make modifications to on-abord avionics hardware, then the costs burden to the airline industry would be prohibitive (as well as the equipment upgrade costs, airworthiness certification would be required for such modifications). We would therefore like to request that this item is carefully considered, and should aircraft need to be modified, that the funding of such changes also be considered.

Thank you for taking time to consider these concerns, and I of course remain at your entire disposal for any information you may require. Please feel free to liaise back directly to me or through the office of SITA Group's President for the Americas, Mr Randy Pizzi (details below).

SITAONAIRO

Very truly yours



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