

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Amendment of Rules Governing Ultra-)	RM-11844
Wideband Devices and Systems)	
)	

**STATEMENT IN SUPPORT OF MOTION FOR
EXTENSION OF TIME TO FILE COMMENTS**

Aviation Spectrum Resources, Inc. (“ASRI”),¹ by its attorney, hereby files this Statement in support of the August 2, 2019, motion of the GPS Innovation Alliance (“GPSIA”) for an extension of the time for filing comments and reply comments on the petition for rulemaking in the above referenced matter.² GPSIA seeks extension of thirty days from the current deadlines established by the Public Notice and the Commission’s Rules to September 18, 2019, and October 3, 2019, respectively.³

¹ ASRI is the communications company of the United States commercial aviation industry and is owned by the airlines and other airspace users. As sponsor of the Aeronautical Frequency Committee (“AFC”), ASRI brings together expertise and opinions from across the aviation sector to promote the safe and effective operation of commercial aviation radio communications and navigation systems in use within the United States. AFC membership includes: Airline and Pilots Association, Airlines for America, Alaska Airlines, American Airlines, Aircraft Owners and Pilots Association, ASRI, Boeing Corporation, Bristow Helicopters, Chevron, Collins Aerospace, Delta Airlines, Era Helicopters, Federal Aviation Administration, Federal Express, Frontier Airlines, Harris Corporation, Helicopter Association International, Helicopter Safety Advisory Conference, International Air Transport Association, JetBlue Airways, National Air Transportation Association, PHI, Inc., Societe Internationale de Telecommunications Aeronautique, Southwest Airlines, United Airlines, and United Parcel Service.

² See *In the Matter of Amendment of Rules Governing Ultra-Wideband Devices and Systems*, Motion for Extension of Time to File Comments of GPSIA, RM 11844 (filed Aug. 2, 2019)(“GPSIA Motion”). See also *In the Matter of Amendment of Rules Governing Ultra-Wideband Devices and Systems*, Petition for Rulemaking of Robert Bosch LLC, RM 11844 (filed June 18, 2019) (“Bosch Petition”).

³ See Public Notice, Consumer & Governmental Affairs Bureau Reference Information Center, *Petitions for Rulemakings Filed*, Report No. 3130, RM-11844 (rel. July 18, 2019) (establishing, in conjunction with the Commission’s Rules, due dates of August 19, 2019, and September 3, 2019, for comments and reply comments on the Bosch Petition.)

ASRI supports the extension request. ASRI is actively reviewing the Bosch Petition, which seeks broad revisions to the Commission's ultra-wideband ("UWB") regulatory framework. ASRI's predecessor, ARINC, was actively involved in the Commission's UWB proceeding which led to the current rules, almost two decades ago, protecting the interest of aviation to operate free from harmful interference over the many radiofrequency bands in which UWB might operate, including safety-of-life restricted bands used by aviation.

The Bosch Petition seeks changes to UWB technical rules that would potentially impact the potential for interference, including, as the GPSIA Motion notes, changes in the minimum bandwidth for UWB, permission for outdoor UWB operations, and expansion of the types of uses to which UWB devices may be put, which could lead to greater proliferation of the devices in many operational settings. These proposed changes, among others in the Bosch Petition, are of potential concern to aviation.

ASRI is examining these requested changes with AFC members, including communications service providers to the aviation industry, for potential impacts. The Bosch Petition makes reference to numerous European standards and waivers that will need to be studied and considered. Having the additional time that GPSIA requests would allow for a more thorough investigation prior to the comment deadline and, ultimately, a better record on which the Commission can make its decisions whether to proceed with any part of the Bosch Petition. As the GPSIA Motion makes clear, there is considerable benefit allowing these complex technical matters to be reviewed and commented on early in the process of considering the Bosch Petition.

For the foregoing reasons, ASRI supports GPSIA's requested extensions of time for comments and reply comments on the Bosch Petition.

Respectfully submitted,

AVIATION SPECTRUM RESOURCES,
INC.



Andrew C. Roy
Director of Engineering
Aviation Spectrum Resources, Inc.
180 Admiral Cochrane Drive, Suite 300
Annapolis, MD 21401

Edward A. Yorkgitis, Jr.
Kelley Drye & Warren LLP
3050 K Street, NW
Washington, DC 20007
(202) 342-8540

Its counsel

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