

TALUS ATOMICS CORPORATION

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August 16, 2017

Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Regarding: *WiMAX Forum Petition Proposing Rules for the Aeronautical Mobile Airport Communications Systems, RM-11793*

Dear Ms. Dortch:

I am writing on behalf of Talus Atomics Corporation to express my strong support for the Petition filed by the WiMAX Forum proposing services rules for the Aeronautical Mobile Airport Communications Systems (AeroMACS).¹ The rapid deployment of AeroMACS throughout the country has the potential to bring significant benefits to American airports, airlines, air travelers, and equipment manufacturers. I urge the Commission to move quickly to adopt a Notice of Proposed Rulemaking proposing service rules for AeroMACS.

AeroMACS is an airport surface communications system that will allow for increased volumes of data exchanges at airports around the country. The global aviation community has adopted AeroMACS to help meet the growing need for high bandwidth, data intensive services and applications for airport surface communications. The FCC has adopted globally harmonized allocations for AeroMACS in the 5000-5030 MHz and 5091-5150 MHz bands; however, the lack of service rules has hindered the widespread deployment of this service in the United States.

AeroMACS benefits airports, airlines and air travelers with broadband-scale digital communications that advance safety and regularity of flight objectives nation-wide and world-wide. AeroMACS potentially supports every aspect of ground operations including support of visual map-based applications associated with the airport or the national air space, messaging applications including FAA air traffic control, sensory applications supporting weather data and surface movement data collection, the conveyance of aircraft telemetry for aircraft operational statistics, and other applications not yet realized or envisioned.

Talus Atomics Corporation, incorporated in 1993 in the state of Texas, is a technology consultancy specializing in the requirements, design and deployment of wireless, fiber and copper-based communications networks. Talus' clients are typically large US and foreign manufacturers of communications equipment or operators of complicated communication networks. Talus provided

¹ See WiMAX Forum Petition for Rulemaking to Adopt AeroMACS Service Rules (filed Mar. 31, 2017) ("Petition").

working group leadership in the forum on behalf of another Forum member company from 2014 to 2017.

The Public Notice released by the Commission seeks comment on a number of issues proposed in the Petition.² Talus Atomics Corporation responds to each of these issues as follows.

Licensing scheme and use of a Channel Manager to determine eligibility and coordinate non-Federal channel usage:

We support the proposal that non-Federal eligible users share available channels under the auspices of a single Commission-appointed nationwide Channel Manager. In addition, we support the proposal that non-Federal eligible users be “licensed by rule” under Part 95.

Non-Federal users would apply to the Channel Manager to secure AeroMACS channel assignments. This licensing scheme is an efficient way to optimize the use of the limited spectrum in these bands. A Channel Manager should derive oversight from industry participants such as the airport and airline communities. With this oversight, a Channel Manager would serve to allocate spectrum fairly on a non-discriminatory basis and verify that spectrum allocations serve the actual need without waste or unfair excess. We believe this licensing scheme is the simplest, fairest and most economical way to assign AeroMACS channels in the spectrum.

Eligibility of non-Federal entities to use AeroMACS:

We support the Petition’s proposed non-exhaustive list of eligible users, which includes airports, airlines, airline navigation service providers, and aeronautical communications network providers.

We believe that this list of eligible non-Federal users includes those entities that are likely to utilize the spectrum for the safety and regularity of flight according to the spectrum allocation mandate. Only through the spectrum use by this variety users will the envisioned benefits of safety and regulatory of flight by AeroMACS actually be realized.

Appropriate technical characteristics and equipment certification requirements:

We support the proposed technical characteristics and equipment certifications rules.

These proposed rules are based on the internationally adopted standards for equipment that will be certified to operate in the band. Specifically, the technical rules for AeroMACS are derived from Standards and Recommended Practices of the International Civil Aviation Organization and Radio Technical Commission for Aeronautics published documents. Adoption of these certification rules will lead to globally harmonized operations in this band and accelerated deployment of AeroMACS networks worldwide.

² See *Wireless Telecommunications Bureau Seeks Comment on WiMAX Forum Petition Proposing Rules for the Aeronautical Mobile Airport Communication System*, Public Notice, DA-17-696 (rel. Jul. 19, 2017 WTB) (“Public Notice”).

Finally, Talus Atomics Corporation wishes to sincerely thank the WiMAX Forum for submitting this important Petition. The WiMAX Forum has provided valuable global leadership in AeroMACS for quite a number of years. The AeroMACS community are well served by the Forum's influence, consistent commitment and prudent direction.

Thank you for seeking comment on these issues raised in the Petition. Talus Atomics Corporation urges the Commission to expeditiously adopt a Notice of Proposed Rulemaking proposing service rules for AeroMACS to bring significant benefits to aviation.

Sincerely,

A handwritten signature in black ink, appearing to read "Ajit Pai", written in a cursive style.

cc: Chairman Ajit Pai
Commissioner Mignon Clyburn
Commissioner Mike O'Rielly
Commissioner Brendan Carr
Commissioner Jessica Rosenworcel
Donald Stockdale, Chief, Wireless Telecommunications Bureau
Julius Knapp, Chief, Office of Engineering and Technology