



August 16, 2019

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
236 Massachusetts Ave., NE
Washington, DC 20002
(Submitted Electronically)

Re: Comments—Notice of Proposed Rulemaking FCC 19-53: *WiMAX Forum Petition to Adopt Service Rules for the Aeronautical Mobile Airport Communications System (AeroMACS)* RM-11793 and *Petition of Airports Council International-North America Regarding Aeronautical Utility Mobile Stations*, RM-11832

On behalf of our airport members, Airports Council International-North America (ACI-NA) is pleased to file the following comments regarding the Notice of Proposed Rulemaking (NPRM) FCC 19-53, issued by the Federal Communications Commission on June 6, 2019.

ACI-NA is the premier trade association that represents airport operators across United States and Canada. Our members operate 366 airports in North America, enplaning over 95% of domestic and almost 100% of international passengers and cargo in the United States and Canada. These airports include numerous large hub airports that have already deployed or are planning to deploy AUMSs and are seeking to maximize the safety and operational benefits associated with them.

We and our members offer comments regarding two of the five matters addressed in the NPRM: (1) RM-11793, the WiMAX Forum petition to adopt service rules for Aeronautical Mobile Airport Communications Systems (AeroMACS) and (2) RM-11832, ACI-NA's own petition regarding aeronautical utility mobile stations. We are supportive of the rule changes the FCC has proposed regarding both matters.

PROPOSED SERVICE RULES FOR AEROMACS

ACI-NA and our member airports support the proposed addition of Subpart T to Part 87 of Chapter I of Title 47 regarding AeroMACS. A number of our airport members have or are actively considering utilizing AeroMACS to provide secure, high bandwidth wireless communications links between remote locations on at their airports and their operations, security, and communications control centers. Airport operators are also interested in the potential for tenants such as airlines and ground handlers to utilize AeroMACS to facilitate safety and operational-critical applications at their facilities.

This said, we do have a few concerns about the language included in the proposed rule.

First, we request that guidance be provided by either the FAA or FCC regarding the format and content of the “written agreements” that are specified in § 87.602(a) Licensing. We will also want to stipulate that such agreements should (and likely will) include provisions (1) related to station operator responsibilities for ensuring proposed base/fixed stations comply with all applicable federal regulations (e.g., FAA Part 77) and (2) regarding the severability and termination of such agreements.

Second, with respect to licensing procedures, we are supportive of third-party spectrum management to the extent that such management expedites deployment of AeroMACS applications/services that enhance the safety, security, and efficiency of airport operations.

Finally, we are concerned about the expense and delay associated with individual base station licensing processes and request that the FCC and FAA coordinate regarding standardized procedures for individual license applications and expedite review of these applications to partially mitigate such delays/expense. We also request clarification regarding the entities that would be authorized to submit these applications.

PROPOSED CHANGES TO § 87.345 AND § 87.349 REGARDING AERONAUTICAL UTILITY MOBILE STATIONS

ACI-NA submitted a petition to the FCC on January 30, 2019--docketed by the FCC as RM-11832--requesting modest but important changes to the FCC’s rules regarding Aeronautical Mobile Utility Stations.¹ As noted the ACI-NA Petition, the objectives of these proposed changes were to:

1. To clarify how ADS-B transponders can be use on airports.
2. To enable safety-enhancing use of 978 MHz UAT transponders by ground vehicles in airport non-movement areas.

The changes to Chapter I of Title 47 of the Code of Federal Regulations, § 87.345 and § 87.349 are consistent with these objectives and consistent with ACI-NA’s petition. Accordingly, we strongly support the changes to these two sections of Part 87.

Responses to Specific Questions Posed by the FCC Regarding Proposed Changes to § 87.345 and § 87.349

In the NPRM, the FCC requested comments regarding two specific issues regarding the proposed changes to § 87.345 and § 87.349.

First, the FCC requested comments regarding the costs and benefits of the proposed changes, particularly from airport owners and operators.² As we noted in the ACI-NA Petition, the proposed changes will provide safety benefits to airport operators, airside ground vehicle operators, flight operators, and the traveling public, including:

¹ Petition of Airports Council International-North America (filed Jan. 30, 2019) (ACI-NA Petition), [https://ecfsapi.fcc.gov/file/10130148407288/ACI-NA%20AUMS%20Petition_\(30Jan18\).pdf](https://ecfsapi.fcc.gov/file/10130148407288/ACI-NA%20AUMS%20Petition_(30Jan18).pdf).

² Para. 45, FCC 19-53.

- The ability for airport operators to monitor ground vehicle positions, aiding in managing emergency response and snow clearance operations in non-movement areas as well as enable multiple stakeholders (e.g., airport operations, contractors, flight operators, FAA air traffic controllers) to track these activities.
- Ensuring that that ramp controllers, airline operations personnel, and airport operations personnel have common situational awareness, even in poor visibility, helping to prevent vehicle-aircraft collisions and other incidents.
- Generation of valuable historical records of accidents, incidents, and near misses, enabling a more effective and proactive safety risk assessments of ramp hazards and more effective better accident and incident investigation.
- Elimination of lost transponder signals as ground vehicles cross airport movement area boundaries, ensuring continuity of vehicle tracking and situational awareness.

We are unaware of any costs associated with adoption of the proposed changes

Second, the FCC requested comments “on whether any additional rule changes are required to clarify that vehicle squitters are authorized to transmit on 978 MHz.”³ We are unaware of any additional rule changes that the FCC would need to make. However, we do believe modest modifications to guidance documentation published by the FAA will be necessary. Specifically, FAA AC 150/5220-26, *Airport Ground Vehicle Automatic Dependent Surveillance-Broadcast (ADS-B) Out Squitter Equipment* will need to be revised to reflect the expanded area in which 978 MHz UAT vehicle squitters would be permitted to broadcast.

POINT OF CONTACT

The point of contact regarding these comments is Christopher Oswald. His full contact information is:

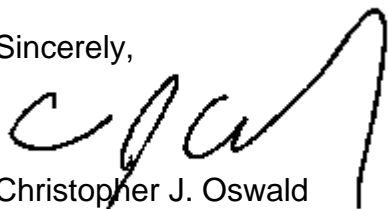
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³ Para. 47, FCC 19-53.

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Again, we thank the Commission for providing ACI-NA with the opportunity to comment on the NPRM and look forward issuance of final rules.

Sincerely,

A handwritten signature in black ink, appearing to read 'C. Oswald', with a long, sweeping horizontal stroke extending to the right.

Christopher J. Oswald
Senior Vice President, Safety & Regulatory Affairs