



Airbus Operations SAS, 316 Route de Bayonne, 31060 Toulouse

August 16, 2017

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

Our Ref : X23D17027985

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

Dear Ms. Dortch:

On behalf of Airbus, I write to express my support for the Petition filed by the WiMAX Forum proposing services rules for the Aeronautical Mobile Airports Communications Systems (AeroMACS).¹

The widespread and expeditious deployment of AeroMACS holds the potential to bring significant benefits to airports, airlines, air travelers, and equipment manufacturers. The Commission should therefore move quickly to adopt a Notice of Proposed Rulemaking proposing services rules for AeroMACS.

AeroMACS is an airport surface communications system that will allow for increased volumes of data exchanges at airports areas. As the demand for high-bandwidth, data intensive services and applications continues to grow, the global aviation community has adopted AeroMACS to help meet these needs for airport surface communications. The FCC has adopted globally harmonized allocations for AeroMACS in the 5GHz band, but the lack of service rules has hindered the widespread deployment of this service in the United States.

First and foremost, the higher bandwidth communications services and applications provided by AeroMACS will establish a new framework for airport surface communications designed to advance the safety and regulatory of flight. For example, AeroMACS can assist in providing pilots up-to-date information on flight plans, maps, and weather forecasts.

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

In addition, airport operations personnel will be able to use AeroMACS networks to perform a high number of applications like Gate operations coordination, Vehicle traffic management, and Emergency services as some examples.

The adoption of service rules will also help promote manufacturing and investment in new AeroMACS products and services. As Airframer, we already took into account the AeroMACS integration in our future aircraft architectures and main avionics suppliers already have commercial AeroMACS kits available, but large-scale manufacturing remains contingent upon the adoption of services rules. Moreover, the adoption of service rules will spur investment in new and innovative products and services that can be deployed on AeroMACS networks.

As aviation community, we shall consider and support Airlines needs with the associated spectrum bandwidth and its management during ground operations.

The Public Notice released by the Commission seeks comment on a number of issues proposed in the Petition.² Airbus 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. This licensing scheme is the most efficient way of optimizing the limited spectrum in these bands. A Channel Manager, with oversight from industry participants such as the airport and airline communities, is best positioned to allocate spectrum fairly on a non-discriminatory basis. Relatedly, we support the proposal that non-Federal eligible users be “licensed by rule” under Part 95 and be able to register sites and secure AeroMACS channels by applying to the Channel Manager. This licensing approach is the simplest, fairest and most economical way to assign AeroMACS channels. Moreover, this approach reduces the possibility that an entity “warehouses” spectrum it does not need at a particular airport.

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. This list of eligible users includes all of those entities who are likely to utilize the spectrum in furtherance of the safety and regularity of right mandate for which the spectrum was originally allocated. Robust access to this spectrum by a variety of users will ensure that we realize the envisioned benefits of safety and regulatory of flight.

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 and technical rules for

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”).

equipment that will be certified to operate in the band. Specifically, the technical rules for AeroMACS are derived from Standards and Recommended Practices (SARPs) of the International Civil Aviation Organization and Radio Technical Commission for Aeronautics published documents. Adoption of such rules will aid in efforts to globally harmonize operations in this band, thus speeding deployment of AeroMACS networks worldwide.

Thank you for seeking comment on the issues raised in the Petition. In light of the significant benefits that will be realized by the swift and widespread deployment of AeroMACS networks, Airbus urges the Commission to expeditiously adopt a Notice of Proposed Rulemaking proposing services rules for AeroMACS.

Finally, Airbus wishes to express its deepest appreciation to the WiMAX Forum for its continued leadership in AeroMACS on a worldwide level.

Sincerely

Claude PICHAVANT

Senior Expert Communications & Surveillance
Manage Flight Systems - EYA

AIRBUS Operations S.A.S.



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