



August 18, 2017

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Room TW-B204
Washington, DC 20554

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

Dear Ms. Dortch:

Airports Council International-North America (ACI-NA) supports many of the elements of the Petition filed by the WiMAX Forum proposing services rules for the Aeronautical Mobile Airport Communications Systems (AeroMACS).¹

ACI-NA represents local, regional and state governing bodies that own and operate commercial airports in the United States and Canada. ACI-NA's members enplane more than 95 percent of the domestic and virtually all the international airline passenger and cargo traffic in North America. In addition, approximately 380 aviation-related businesses are also members of ACI-NA, providing goods and services to airports.

A significant part of ACI-NA's mission to advocate for policies, regulations, services, and technologies that strengthen the ability of airports to serve their passengers, customers and communities. In accordance with this mission, we support many of the elements of the Petition.

AeroMACS is an airport surface communications system that will allow for increased volumes of data exchanges at airports around the country. 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 5000-5030 MHz and 5091-5150 MHz bands, but the lack of service rules has hindered the widespread deployment of this service in the United States.

ACI-NA views AeroMACS as a key wireless communications technology with the potential to reduce the costs associated with deploying remote sensors, control systems, surface surveillance capabilities, and airfield data communications.

The Public Notice released by the Commission seeks comment on a number of issues proposed in the Petition. ACI-NA responds to each of these issues as follows:

¹ WiMAX Forum Petition for Rulemaking to Adopt AeroMACS Service Rules (RM-11793), filed with the FCC on March 31, 2017.

- **Licensing scheme and use of a Channel Manager to determine eligibility and coordinate non-Federal channel usage.** We do not have a strong opinion regarding the precise mechanism by which the eligibility determinations and coordination of non-Federal channel usage would be managed. This said, we strongly believe that any third-party channel management arrangement must include (1) airport operators as stakeholders with a voice in the governance of channel management activities and (2) that fee structures associated with the third party channel manager appropriately and directly reflect the costs of providing these services without excessive overhead or other charges. The licensing proposal included in the Petition appears to meet these criteria.
- **Eligibility of non-Federal entities to use AeroMACS.** We strongly 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 flight mandate for which the spectrum was originally allocated.
- **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 equipment that will be certified to operate in the band. Specifically, the of the International Civil Aviation Organization (ICAO) and RTCA-published documents. Adoption of such rules will aid in efforts to globally harmonize operations in this band, thus speeding deployment of AeroMACS networks worldwide.

We appreciate the opportunity to provide comments regarding the Petition and encourage the Commission to expeditiously adopt a Notice of Proposed Rulemaking proposing service rules for AeroMACS.

Sincerely,



Christopher J. Oswald
Vice President, Safety & Regulatory Affairs