



Aerospace Systems
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August 18, 2017

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

Re: RM-11793

Dear Ms. Dortch:

The Aerospace Systems Sector of L3 Technologies, Inc. ("L3") submits this letter for the Commission's consideration in connection with the above-referenced Petition for Rulemaking by the WiMax Forum.

The Petition seeks the adoption of rules for the implementation of the airport surface communications system known as AeroMACS in the 5000-5030 and 5091-5150 MHz bands. Unfortunately, while the 5091-5150 MHz band is also allocated for flight testing, the Petition does not address the means by which L3 and other flight test operators can gain access to this spectrum for their flight test missions.

L3 is actively involved in flight test programs for the Department of Defense and air transportation companies. L3 has used various bands for flight test telemetry in the past but, given the exponential growth in data requirements we are experiencing, the 5091-5150 MHz band has become critical to meeting the demand. This band would be used for flight testing new and modified versions of both civil and DOD aircraft. Access to the band at the few civil airports where flight testing is conducted has become vital to the productivity and safety of our flight test programs.

Initial analyses conducted by the Aerospace and Flight Test Radio Coordinating Council, of which L3 is a member, suggest that flight testing and AeroMACS operations are compatible. However, in our view field tests to prove out and refine the compatibility techniques should be conducted before any steps toward a notice of proposed rulemaking. The results of such a study will assist the Commission and interested parties in formulating the proper procedures for coordination and assignment of channels to support both AeroMACS and the flight test community in a geographic area.

A denial of access to this band would have serious detrimental effects for L3 and aerospace manufacturers generally. The ability to support and strengthen our national security, enhance civil airframes, and test new aerospace technologies depend on the United States' ability to lead the world in avionic development. Without access to the band, flight test programs will be delayed, and costs increased, thereby undermining U.S. competitiveness in the global aerospace marketplace.

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In conclusion, L3 respectfully urges that the Commission ensure access to the 5091-5150 MHz band for flight test purposes at the few civil airports where flight testing is conducted, before the agency begins to consider whether to proceed to a notice of proposed rulemaking.

Sincerely,



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cc: Chairman Ajit Pai
: Commissioner Mignon Clyburn
: Commissioner Michael O'Rielly
: Commissioner Brendan Carr
: Commissioner Jessica Rosenworcel