

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

Error! Reference source not found.

COMMENTS OF AIRTEL, INC.

Airtel, Inc., headquartered in 3 Bethesda Metro Center, Suite 700, Bethesda, MD 20814, is a subsidiary of Airtel ATN, which employs 30 people worldwide. With more than 20 years in the aviation industry, Airtel ATN has consistently been an international leader in the development of data link communications equipment and test services for the aerospace industry. The company is a major provider of portable data link test equipment for the FAA's Next Generation Air Transportation System (NextGen) Data Communications program.

Our company has strong interest in the development of a healthy AeroMACS ecosystem with a competitive choice of equipment manufacturers and network service providers. As a data communications supplier for Data Service Providers, Air Traffic Control facilities, airframe manufacturers and airlines, we see a solid market opportunity in the provision of new high-bandwidth flight services to operators in the airport surface, to improve safety and efficiency of collaborative decision-making in aircraft turnaround processes.

Airtel, Inc. submits the comments below to the following paragraphs of the FCC 19-53 Aviation Services Notice of Proposed Rulemaking:

38. Eligibility. The proposed rules would preclude important stakeholders from using AeroMACS unless the airport owner or operator consents. In effect, airports would become the gatekeepers of AeroMACS services. Contrary to the Commission's spirit of removing barriers to access to wireless services, restricting eligibility rules would create artificial barriers to

AeroMACS services and prevent interested stakeholders to have access to channels in the AeroMACS band.

Specifically, manufacturers of AeroMACS data link components and their representatives plan to use AeroMACS for purposes of network development and product demonstrations on a temporary basis. Consequently, developmental users should be identified among those automatically eligible to petition for the use of AeroMACS spectrum directly from the Channel Manager. Additionally, airlines themselves, alongside traditional communications service providers such as SITA and Collins Aerospace should be accorded equal status and be designated eligible entities for application for the use of AeroMACS spectrum directly from the Channel Manager.

40-43. Channel management and coordination with other authorized users.

Designating a single, nationwide channel manager is the best way to ensure the consistent, efficient and fair management of AeroMACS channels. A single, nationwide channel manager will provide AeroMACS users with one point of contact regardless of the airport at which they are operating, thus saving time and money for eligible users that otherwise would be spent negotiating different allocation and interference procedures at each airport. The channel manager will also maximize the efficient use of spectrum, enabling AeroMACS to meet the unique needs of each location, and ensure fair management of AeroMACS channels, making its services available on a non-discriminatory basis to all eligible AeroMACS users.

The channel manager will serve as the single point of contact for non-Federal AeroMACS users should any coordination issues arise with these other authorized users of the band. The channel manager also will help coordinate AeroMACS spectrum access with federal users. This

coordination will ensure the efficient use of AeroMACS spectrum by employing sharing approaches tailored to the needs of the federal and non-federal AeroMACS users at each airport.

Regarding selection and eligibility of the channel manager, the FCC should designate as an entity that is: 1) impartial; 2) an expert in AeroMACS technology and applications; and 3) a non-profit.

37. Licensing. The proposed requirement for individual licensing of fixed, base and mobile AeroMACS units is unnecessary and onerous. The location information gained from such an individual licensing regime will already be available with the channel manager, who will use such information in coordinating the use of AeroMACS spectrum at each airport. A requirement for users to also make this location information available through the FCC's Universal Licensing System is duplicative and administratively burdensome. Instead, AeroMACS operations should be licensed by rule. Such an approach would be more administratively efficient and will encourage robust deployment and availability of AeroMACS services and applications.

39. Coordination. The proposal to require pre-coordination of AeroMACS deployments with FAA Regional Offices will impose significant and unnecessary delays and costs on AeroMACS users. Coordination with federal AeroMACS users will be performed by the channel manager. The Commission should reject a pre-coordination requirement on individual licensees. Coordination by the channel manager will be more efficient and expedient.

44. Technical rules. The international nature of AeroMACS services requires the adoption of technical rules that mirror those standards approved by international technical standards bodies. The FCC should adopt the proposed technical rules based on the requirements currently

incorporated in the International Civil Aviation Organization Standards and Recommended Practices and in the RTCA Minimum Operational Performance Standards.

Respectfully submitted,

GIULIO DI TILLIO
HEAD OF RESEARCH AND
DEVELOPMENT

A handwritten signature in blue ink, appearing to read 'G. Di Tillio', with a stylized flourish at the end.

September 3, 2019