

## **Selex ES, Inc. Comments to the Aviation Services NPRM**

### **WT Docket No 19-140**

Selex ES, Inc. hereby files the following comments in response to the Federal Communication Commission's (FCC) Notice of Proposed Rulemaking in the above-referenced proceeding.

Selex ES, Inc. recommends the FCC adopt a single, nationwide channel manager for the AeroMACS spectrum to ensure consistency and efficiency in AeroMACS expansion. Requiring AeroMACS users to coordinate with individual airport owners and operators would lead to market inconsistencies complicating and adding unnecessary costs to equipment design and/or AeroMACS service models.

#### **I. Background**

- a. Selex ES, Inc., a subsidiary of Leonardo Company, designs, develops, manufactures, installs, commissions, and supports a complete line of navigation and surveillance equipment for Military and Civil Aviation customers globally. Our team of 100 engineers, manufacturing technicians, installation experts, and technical trainers located in Overland Park Kansas proudly support our customers on all seven continents.
- b. Selex ES, Inc. expects AeroMACS to deliver cost efficiencies in safety critical navigation and surveillance equipment installation and in remote monitoring and control of this equipment on airport properties around the world.

#### **II. Eligibility**

- a. The FCC's eligibility rules should encourage the robust deployment of AeroMACS services.
- b. The rules, as currently proposed, would preclude important stakeholders from using AeroMACS unless the airport owner or operator consents, creating uncertainty and stifling necessary investment in equipment design and development.

### III. Channel Management

- a. Designating a single, nationwide channel manager is necessary to ensure consistent, fair, and efficient management of AeroMACS channels.
- b. A single, nationwide channel manager will improve necessary coordination of AeroMACS spectrum access with federal users, thereby saving users time and money by avoiding coordination with multiple organizations and dealing with different allocations and procedures that vary by location.
- c. To further ensure fair management of AeroMACS channels, the FCC should designate as channel manager an entity that is: impartial; an expert in AeroMACS technology and applications; and a non-profit.

### IV. Coordination With Other Authorized Users

- a. A single channel manager will help promote coordination between AeroMACS users and other authorized users of the band.
- b. A single channel manager can serve as a single point of contact for non-Federal AeroMACS users should any coordination issues arise with these other authorized users of the band.

### V. Licensing and Coordination

- a. Flexible licensing and coordination rules are necessary to promote robust AeroMACS service and application deployment. A single, national channel manager will have the necessary location information and can be the focal point for the FCC if the information is ever needed, eliminating that unnecessary burden on individual AeroMACS users.
- b. The proposed requirement for individual licensing of fixed, base, and mobile AeroMACS units is unnecessary and onerous and will result in unnecessary costs to aviation stakeholders including the flying public.

- c. A single, national channel manager can provide coordination with federal AeroMACS Users and FAA Regional Offices more efficiently than requiring individual AeroMACS users to do so.

## VI. Technical Rules

- a. AeroMACS is an international service, already more widely available in other parts of the globe, and therefore requires adoption of technical rules consistent with the standards approved by international technical standards bodies. As such, 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.

## VII. Conclusion

- a. The FCC should adopt a single, nationwide channel manager for the AeroMACS spectrum to ensure consistency and efficiency in AeroMACS expansion. Requiring AeroMACS users to coordinate with individual airport owners and operators would lead to market inconsistencies complicating adoption and adding unnecessary costs.
- b. The FCC should designate as channel manager an entity that is impartial; an expert in AeroMACS technology, applications, and the technical standards approved by corresponding international standards bodies (e.g., ICAO and RTCA); and a non-profit.