

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Petition of Aviation Spectrum Resources, Inc. for)	RM No. 11818
Amendment of Sections 87.173(b) and 87.263(a) of the)	
FCC's Rules to Allow Use of the Lower 136 MHz Band)	
by Aeronautical Enroute Stations)	
)	

COMMENTS OF HARRIS CORPORATION

Harris Corporation ("Harris"), the prime contractor of the Federal Aviation Administration ("FAA") for the implementation and roll out of Data Communications ("Data Comm"), supports the petition by Aviation Spectrum Resources, Inc. ("ASRI") for amendment of Sections 87.173(b) and 87.263(a) of the Commission's rules to allow use of the frequencies between 136.000 – 136.475 MHz (the "Lower 136 MHz Band") to support both the airline industry's aeronautical operational control and FAA air traffic control communications (the "Petition").

Data Comm is a key initiative of the FAA's Next Generation ("NextGen") transformation, and one that already has demonstrated early progress and is delivering operational benefits to equipped users. Data Comm, which leverages the airline industry's coverage and network infrastructure to implement controller pilot data link communications, supplements air traffic control voice by enabling controllers to send strategic and routine data link messages between controllers and pilots. Data Comm is a benefits-based program; airspace users are not mandated or required to use the service, and aircraft operators make the investment in the equipment on a voluntarily based on operational benefits. Initial airspace user equipage and operational feedback of the service has been very positive with more than 4,900 equipped

aircraft from commercial and business aviation users. Today, Data Comm is operational at 62 airports, and it is on track to operate in en route airspace nationwide by 2020.

Through ASRI, the FAA and airline industry reached consensus on a national channel plan across the whole 136-137 MHz band. ASRI's proposed regulatory changes in the Lower 136 MHz Band are minor and reflect how the system currently operates with both aeronautical operational control ("AOC") and air traffic control ("ATC") aviation traffic within the adjacent 136.500-137 MHz band. Harris encourages the FCC to approve ASRI's request for rule changes for the Lower 136 MHz Band in a prompt manner in order to support the FAA's nationwide rollout of Data Comm services.

Respectfully submitted,

/s/ Tania Hanna

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