

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Petition of Aviation Spectrum Resources, Inc.)	RM No. 11818
for 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 DELTA AIR LINES

Delta Air Lines hereby comments on the petition for rulemaking submitted by Aviation Spectrum Resources, Inc. ("ASRI") on changes to Aeronautical Enroute Stations ("AES") used for aviation Datalink.

Delta Air Lines 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 – 136.4875 MHz band (the "Lower 136 MHz Band") to support Aeronautical Enroute Service ("AES")*. AES comprises of both Aeronautical Operational Control ("AOC") and Federal Aviation Administration's ("FAA") Air Traffic Control ("ATC") communications. This change will facilitate the expansion of the FAA's Data Communications program, which is already in use within the 136.500-136.975 MHz band and is a core element of the FAA's initiative to modernize our nation's air transportation system.

Delta Air Lines serves more than 180 million customers each year. With an industry-leading global network, Delta and the Delta Connection carriers offer service to 304 destinations in 52 countries on six continents. Headquartered in Atlanta, Delta employs more than 80,000 employees worldwide and operates a mainline fleet of more than 800 aircraft.

Data Comm is a key initiative of the FAA's Next Generation ("NextGen") program, which is delivering significant operational benefits to equipped users. The DataComm program utilizes existing aviation industry VHF spectrum using a technology commonly referred to as to as VHF Data Link Mode 2 ("VDLM2"). This spectrum is used for both ATC and Airline Datalink (AOC) communications. The aeronautical stations are operated by ARINC and SITAONAIR, being licensed through ASRI in the 136.500 to 136.975 MHz band. Since the introduction of the DataComm program, the FAA has stated their intention to clear the 136-136.475 MHz band ("the lower 136 MHz band") of current allocations and to make capacity for the continued growth and expansion of the Data Comm program. Conservative estimates indicate the need to begin implementing this additional capacity by late 2019.

In summary, Delta Air Lines fully endorses the proposal and encourages the FCC to approve ASRI's request for rule changes in the lower 136 MHz band in order to support nationwide rollout of Data Comm services. Some key reasons for supporting this rule change may be summarized as follows:

- Use of the 136.500 to 136.975 MHz VHF band ("the upper 136 MHz Band") is currently shared by both AOC and ATC applications; expanding this model to include the full 136.000 to 136.975 MHz range is consistent with the original intentions for this band.
- The DataComm program, currently operating in the 136.500 to 136.975 MHz ("the upper 136 MHz Band"), has been highly successful and yielded proven benefit to the US Government and the aviation industry. Adding the lower 136 MHz band will continue to yield benefits and is in best interests of the general public.
- Stakeholders within the aviation community, including FAA and the airlines, have met and discussed this matter at length and are in full support of this proposal.
- Use of the lower 136 MHz band for the stated purpose will improve flight safety and efficiency within the USA National Airspace.

Respectfully Submitted,

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