

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 JETBLUE AIRWAYS

JetBlue Airways hereby provides the following comments on the petition for rulemaking submitted by Aviation Spectrum Resources, Inc. ("ASRI") for changes to the Commission's rules concerning Aeronautical Enroute Stations ("AES") within Subpart I or Part 87. Jet Blue Airways is committed to scheduling airline services throughout the United States and the Caribbean. JetBlue Airways fully supports the ASRI petition concerning the future use of VHF Data Link Mode 2 ("VDLM2") frequencies in the 136-136.475 MHz band ("the lower 136 MHz band") to support the aviation industry and the Federal Aviation Administration's ("FAA") Data Communications Program ("Data Comm").

As a member of the Aeronautical Frequency Committee ("AFC"), JetBlue Airways has been involved in the frequency planning for Data Comm operations using VDLM2 in the 136-137 MHz band. Allowing assignment of VDLM2 AES stations in the lower 136 MHz band is essential in order to meet the FAA's and JetBlue's needs, utilizing the VDLM2 network infrastructure provided by our commercial service providers to deliver essential datalink services required by JetBlue Airways. Therefore, ASRI's proposed changes are a key requirement for the successful implementation of the Data Comm beyond 2020, particularly in the timely safety of flight, Air Traffic Control ("ATC"), and Airline Operation Control ("AOC") arenas.

JetBlue remains a "new generation" air carrier and utilizes the latest communication assets

required to meet their customer safety and competitive needs. The requested regulatory changes from ASRI are minor and will enable the same VDLM2 system to provide both AOC and ATC traffic across the whole 136-137.000 MHz band. The Commission adopting such changes in a timely manner helps assure the pathway for JetBlue's continued planning and implementation of the valuable Data Comm program.

Respectfully Submitted,

*/s/ Alan Werner, on behalf of JetBlue Airways*

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