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	)	

REPLY COMMENTS OF COLLINS AEROSPACE

The record in this proceeding confirms that the Commission should grant Aviation Spectrum Resources, Inc.'s ("ASRI's") Petition for Amendment.[1] As several parties have explained, the proposal submitted by ASRI is critical to the future of the Federal Aviation Administration's ("FAA") Data Communications ("DataComm") program, which has demonstrated substantial and growing benefits in air transportation efficiency and safety-of-flight within the National Airspace System ("NAS").[2] Collins Aerospace adds its support to those commenters encouraging the Commission to take swift action on the ASRI petition to help realize this important goal.

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[1] Petition of Aviation Spectrum Resources, Inc. 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, RM-11818 (filed Oct. 18, 2018) ("ASRI Petition").

[2] *See generally* Comments of the Air Line Pilots Association, RM-11818 (filed Nov. 14, 2018); Comments of Jet Blue Airways, RM-11818 (Nov. 21, 2019); Comments of Delta Air Lines, RM-11818 (filed Nov. 19, 2018); Comments of Frontier Airlines, RM-11818 (filed Nov. 16, 2018); Comments of Harris Corporation, RM-11818 (filed Nov. 14, 2018).

I. INTRODUCTION AND SUMMARY

Collins Aerospace (or "Collins"), a unit of United Technologies Corp., is a leader in technologically advanced and intelligent solutions for the global aerospace and defense industry. Created in 2018 by bringing together Rockwell Collins and UTC Aerospace Systems, Collins Aerospace has the capabilities, comprehensive portfolio and expertise to solve customers' toughest challenges and meet the demands of a rapidly evolving global market. Collins Aerospace is an industry-leading developer and supplier of avionics to the business, commercial, and military aviation markets. In addition, Collins Aerospace is a leading provider of connectivity and managed data service solutions for aircraft operators. Through its products and services, Collins Aerospace helps keep passengers, flight crews and militaries safe, connected, and informed. Collins' avionics products are used on thousands of civil and military aircraft, including all major original equipment manufacturers for airframes including Boeing, Airbus, and Embraer.

Since 1978, Collins Aerospace has been providing high reliability datalink service through its ARINC GLOBALink^{SM} service (also known as ACARS$^{®}$). Collins Aerospace provides over 3 million safety-of-flight datalink messages per day to over 10,000 air transport class commercial aircraft through GLOBALink. Because of this expertise, Collins Aerospace has been highly engaged on VHF issues and is a voting member of ASRI's Aeronautical Frequency Committee. Additionally, Collins Aerospace has been an integral stakeholder in the FAA's DataComm program, which will enhance aviation safety by providing pilots with clear digital communications, as opposed to relying on voice communications with Air Traffic Control ("ATC"), through one simplified terminal. By swiftly adopting ASRI's proposed changes to the

Commission's rules, the Commission will ensure the DataComm program has the building blocks it needs to be successful.

II. THE PROPOSAL WILL FACILITATE EXPANSION OF FAA'S DATACOMM PROGRAM AND HAS BEEN FULLY VETTED

Initiating a rulemaking to amend Sections 87.173(b) and 87.263(a) of the Commission's Rules to allow use of the lower 136 MHz band by aeronautical enroute stations is timely, necessary, and has been fully vetted and supported by the aviation industry and the FAA. As described in the Petition and as many commenters noted, the proposal will allow the use of the 136.000-136.4875 MHz band for the Aeronautical Enroute Service ("AES"), which will enable both Aeronautical Operational Control ("AOC") and FAA ATC communications using Federal Communications Commission ("FCC")-licensed aeronautical enroute stations. AOC communications include critical aircraft positioning and safety information by airlines and aircraft through the Collins Aerospace ARINC GLOBALink^{SM} network and SITAONAIR. As noted by ASRI, enabling this functionality is critical because AOC and ATC work in tandem to support aviation safety.

Currently, Harris Corporation holds the DataComm contract with the FAA; ARINC Incorporated, a Collins Aerospace company, is a subcontractor to Harris Corporation. DataComm capitalizes on the aviation industry's existing VHF digital data link stations, commonly referred to as VHF Data Link Mode 2 ("VDLM2"), which have been used for both ATC and AOC communications since November 2000. The aeronautical stations are operated by Collins Aerospace and SITA and are licensed through ASRI in the 136.500-136.975 MHz band. The DataComm program has been highly successful and of proven benefit to the U.S. Government, the aviation industry, and the flying public because it has replaced inefficient voice

communications with automated and precise digital communications, thereby increasing air traffic efficiency and safety within the NAS.

DataComm currently operates in 136.500-136.975 MHz ("the upper 136 MHz Band") which is shared by both AOC and ATC applications. Expanding the spectrum available to AOC and ATC to include the lower 136 MHz band will provide a pathway for growth and, as noted by ASRI and commenters, is entirely consistent with the FAA's and FCC's intentions for the 136.000-136.975 MHz band.[3] From the onset of the program, the FAA has stated its intention to clear the VDL lower 136 MHz band of current allocations in support of DataComm; and the lower band has been cleared and is ready to support the program.[4] By adopting the rule changes to the lower 136 MHz band requested by ASRI, the Commission will support the future growth of the DataComm program by ensuring adequate capacity of AES stations that can transmit both ATC and AOC.

III. CONCLUSION

ASRI's proposed rule change to the lower 136 MHz band will enhance the safety of airlines and the flying public. The change has been fully supported by the relevant stakeholders in the aviation community, including the FAA and the airlines. Collins Aerospace fully supports ASRI's petition, is in agreement with all comments filed on the record in this proceeding, and as such, requests the Commission move quickly to implement ASRI's requested rule changes.

[3] *See* ASRI Petition at 5-7 (outlining history of the lower 136 MHz band).

[4] *Cf.* ASRI Petition at 9 ("Moreover, because AES stations are currently precluded in the lower 136 MHz band, the band segment is being lightly used at this time.").

Respectfully submitted,

/s/ LeAnn Ridgeway

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LeAnn Ridgeway
Vice President & General Manager
Avionics
COLLINS AEROSPACE
2551 Riva Road
Annapolis, MD 21401
410-266-4000

/s/ Laurie M. Sussman

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Laurie M. Sussman
Assistant General Counsel
Avionics
COLLINS AEROSPACE
2551 Riva Road
Annapolis, MD 21401
410-266-4000

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