

December 17, 2018

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th St S.W., Room TW-A325
Washington, DC 20554

RE: GN Docket No. 18-122, Expanding Flexible Use of the 3.7 to 4.2 GHz Band
Notice of *Ex Parte*

Dear Ms. Dortch:

Pursuant to Section 1.1206 of the Commission's rules¹, this letter provides notice that on December 13, 2018, Max Fenkell from the Aerospace Industries Association, Jonathan Archer from the General Aviation Manufacturers Association, Andrew Roy from Aviation Spectrum Resources Inc., Ryan Terry from the Lockheed Martin Corporation, Ed Hahn from the Airline Pilots Association, Harold Summers from the Helicopter Association International, Eddie Straub from Garmin International, Sai Kalyanaraman from Collins Aerospace and Noppadol Pringvanich from the International Air Transport Association (collectively, the non-Commission participants referred to herein as the "Representatives") met with Commission staff from the Office of Engineering and Technology, the Wireless Telecommunications Bureau and the International Bureau regarding GN Docket No. 18-122.

During the meeting, the Representatives briefed the Commission on the aviation industries' concerns regarding harmful interference from potential new 5G applications in the 3700-4200 MHz spectrum band to aviation systems operating in the adjacent 4200-4400 MHz band.² The radio altimeter and wireless avionics intra-communications ("WAIC") systems operate in the adjacent 4200-4400 MHz radio frequency band, and the uncompromised operation of both systems is essential to safety of flight.

As the Representatives described, the radio altimeter is a critical avionics system that facilitates the controlled landing of aircraft and accuracy of the terrain avoidance system. It currently is installed on all commercial and business aviation operations, as well as the majority of helicopter operations, and is equipment mandated by the Federal Aviation Administration ("FAA").

The Representatives also described the WAIC system, which is currently being installed on planes, and also operates in the 4200-4400 MHz spectrum band. The WAIC system is used on newer aircraft to increase the safety and efficiency of their operations by replacing portions of aircraft wiring by using onboard short-range wireless systems. To protect such operations, the group stressed it is vital that a full assessment is conducted of the effects of proposed 5G systems

¹ 47 C.F.R. § 1.1206.

² See, AIA-GAMA comments RE: GN Docket No. 18-122 "Expanding Flexible Use of the 3.7-4.2 GHz Band" filed on 10/29/2018: <https://ecfsapi.fcc.gov/file/1029597421299/FINAL%20AIA%20GAMA%20Comments--GN%20Docket%20No%2018-122.pdf>

operating in the adjacent band before a new mobile allocation is made anywhere in the 3700-4200 MHz band.

The group also noted that some of the Representatives are conducting a joint test of the potential impact of 5G signals to radio altimeter operations. The Representative stated that once the testing is complete the data could be used to inform the considerations that the Commission must undertake to ensure that these essential operations are not compromised.

While the above-mentioned testing was not complete at the time of the meeting, the Representatives did express support for an approach that ensures, if the Commission changes its rules, any new allocations focus on the lower portion of the 3700-4200 MHz band.

The meeting concluded with both parties stressing the importance of continuing discussions to find a solution that ensures the safe deployment of new entrants into the band, while not comprising aviation safety.

Please direct any questions concerning this submission to the undersigned.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Max Fenkell', is positioned above the typed name.

Max Fenkell
Manager, Unmanned and Emerging Aviation Technologies
Aerospace Industries Association

cc: Julie Knapp
Donald Stockdale
Tom Sullivan