



Brian Benison
Director
Federal Regulatory

AT&T Services, Inc.
1120 20th Street, NW
Suite 1000
Washington, DC 20036

T: 202.457.3065
F: 202.457.3070

September 30, 2014

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

**Re: *Wireless Telecommunications Bureau Seeks Comment on AT&T
Petition for Rulemaking Regarding Revision of WCS Rules, RM-11731***

Dear Ms. Dortch:

On September 26, 2014, Joan Marsh, Chad Townes, William Roughton, and the undersigned of AT&T Services, Inc., met with Roger Noel, Linda Chang, Melissa Conway, Jonathan Perez and Tim Maguire of the Wireless Telecommunications Bureau, and Jameson Prime, Patrick Forster, and Bahman Badipour of the Office of Engineering and Technology, and Stephan Duall, Sankar Persaud, and Jay Whaley of the International Bureau on the above-referenced proceeding.

During the conversation, AT&T discussed its plans to offer a robust In-Flight Connectivity Service that would among other things provide internet access, entertainment options and gaming to airline customers as well as a variety of services to the airline carriers themselves. AT&T further explained that it is planning to test equipment for the new system in the Phoenix area to enhance the design and to determine design elements that will protect both border areas and adjacent licensees.

In particular, AT&T explained that it would utilize site placement, reduced power levels, narrow beam directional antennas, up-tilt and similar engineering practices to ensure that base stations would not inappropriately broadcast across international boundaries in compliance with both the letter and spirit of the treaties for both the Canadian and Mexican borders. Similarly, AT&T noted that its avionics stations would utilize the aircraft GPS to lower or turn off the WCS signal as the aircraft approached a border area. Finally, AT&T noted that the same engineering practices could be used to protect adjacent WCS licensees as needed. The attached presentation was used to facilitate the discussion.

In accordance with the Commission's rules, this letter is being filed electronically with the Secretary for inclusion in the public record.

Sincerely,

/s/ Brian J. Benison

cc:	Roger Noel	Linda Chang	Melissa Conway
	Tim Maguire	Jameson Prime	Patrick Forster
	Bahman Badipour	Stephan Duall	Sankar Persaud
	Jay Whaley	Jonathan Perez	