



February 5, 2015

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
The Portals
445 12th Street, SW
Office of the Secretary, Room TW B204
Washington DC 20554

Re: GN Docket No. 13-114

Dear Ms. Dortch:

On February 4, 2015, staff from the Association of Flight Attendants-CWA, AFL-CIO (“AFA”) and Dillard Group International (“DGI”) met with Admiral David Simpson and Kenneth Moran from the PSHSB, Diane Cornell from the OCH, Brian Regan from the WTB, Troy Tanner from the IB, and Julius Knapp from the OET. The AFA representatives who attended the meeting were Chris Witkowski and Dinkar Mokadam, the DGI representative who attended the meeting was Denny Dillard, and Tim Read, technical consultant to DGI, participated by phone.

At the meeting, the AFA and DGI representatives expressed concern with the proposal in GN Docket No. 13-114 to establish an air-ground mobile broadband service over the contiguous United States. These concerns are similar in nature to those expressed in reply comments to another Commission proposal, one that would lift a long-standing ban on using cell phones for voice and data on flights,¹ by AFA and other organizations that form the Safety and Security in the Air Coalition (“SSAC”). In the opinion of the AFA and DGI representatives, either proposal would greatly enhance communications capabilities for terrorists and increase cyberwarfare vulnerabilities, leading to unacceptable risks of successful attacks on the United States aviation system.

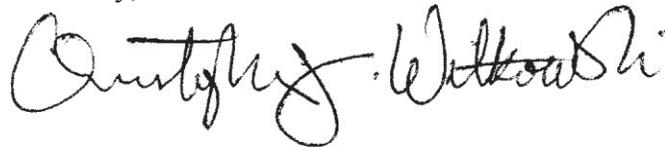
The AFA and DGI representatives also expressed concerns that the GN Docket No. 13-114 proposal does not discuss operational and cyber security risks. The Commission representatives noted, and the AFA and DGI representatives were previously aware, that GN Docket No. 13-114 includes a letter from the FBI reflecting the views of the executive branch requiring that any future spectrum licensees pursuant to the final rule would be required to follow any rules, regulations or directives of agencies with jurisdiction for aviation safety and security, and would have to coordinate with those agencies. The AFA and DGI representatives nonetheless recommended that the Commission and other Federal government partners, with assistance from AFA, DGI and other stakeholders, first review specific operational and cyber threat scenarios and attempt to develop appropriate, effective mitigations to ensure the safety and security of our nation’s commercial transport aviation system.

¹ Expanding Access to Mobile Wireless Services Onboard Aircraft, 79 Fed. Reg. 2615 (Fed. Comm’n Comm’n Jan. 15, 2014).



In closing, the AFA and DGI representatives expressed the view that the United States aviation system is a uniquely attractive target for terrorists. Any successful coordinated attack on this infrastructure will lead to catastrophic loss of lives and severe economic disruptions. Before embarking on a path that will significantly expand mobile broadband capability on commercial airplanes, the AFA and DGI representatives recommended that the Commission bring together a broad range of government and industry subject matter experts and coordinate with them to assess the full scope of potential threats and vulnerabilities and attempt to develop and evaluate appropriate mitigations in order to provide thorough information for consideration of whether to finalize the proposed rule.

Sincerely,

A handwritten signature in black ink, reading "Christopher J. Witkowski". The signature is written in a cursive style with a large, stylized initial "C".

Christopher J. Witkowski
Director, Air Safety, Health and Security