



Hogan Lovells US LLP  
Columbia Square  
555 Thirteenth Street, NW  
Washington, DC 20004  
T +1 202 637 5600  
F +1 202 637 5910  
[www.hoganlovells.com](http://www.hoganlovells.com)

February 9, 2015

**VIA ELECTRONIC DELIVERY**

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

**Re: Notice of *Ex Parte* Presentations  
GN Docket No. 13-114; RM-11640**

Dear Ms. Dortch:

On February 5, 2015, representatives of Gogo Inc. (“Gogo”) had separate meetings with Louie Peraertz, Legal Advisor to Commissioner Clyburn; Diane Cornell, Special Counsel to Chairman Wheeler, and Renee Gregory, Legal Advisor to Chairman Wheeler; Erin McGrath, Legal Advisor to Commissioner O’Rielly; and Brendan Carr, Legal Advisor to Commissioner Pai. During all of these meetings, Gogo explained that the public interest would be served best by dividing the proposed 500 MHz Air-Ground Mobile Broadband Service (“AGMBS”) band into three or more licenses for auction and that each license could provide sufficient capacity to offer a robust service. Gogo also urged the FCC to adopt a five-year substantial service requirement or, in the alternative, a seven-year requirement with an interim construction benchmark, consistent with its filings in this proceeding.<sup>1</sup>

With respect to law enforcement and safety concerns, Gogo stated that it would comply with all applicable rules, regulations, or directives of any agency with jurisdiction, as requested recently by the Federal Bureau of Investigation in this proceeding.<sup>2</sup> Finally, in response to a question, Gogo explained that technical complexity, physical constraints, and cost often prevent aircraft operators from employing the radio equipment of more than one AGMBS provider on any single aircraft. Nonetheless, AGMBS providers likely would compete on a periodic basis for contracts to provide service to those aircraft, and offering at least three 14 GHz licenses for auction -- with an aggregation limit of 250 MHz -- would help ensure a competitive inflight communications market.

---

<sup>1</sup> See Comments of Gogo Inc., FCC Docket Nos. 13-114 and RM-11640, at 9 (Aug. 26, 2013); Letter from Michele C. Farquhar, Hogan Lovells, to Marlene H. Dortch, Secretary, FCC Docket Nos. 13-114 and RM-11640 (Apr. 21, 2014).

<sup>2</sup> See Letter from Sherry E. Sabol, Acting Deputy General Counsel, Federal Bureau of Investigation, to Marlene H. Dortch, Secretary, FCC Docket Nos. 13-114 and RM-11640 (Jan. 15, 2015).

Pursuant to Section 1.1206(b) of the Commission's rules, I am filing this letter electronically in the above-referenced dockets. Please contact me directly with any questions.

Respectfully submitted,

*/s/ Michele C. Farquhar*

Michele C. Farquhar  
Partner

Counsel to Gogo Inc.  
michele.farquhar@hoganlovells.com  
D 1+ 202 637 5663

cc (via email):

Brendan Carr  
Diane Cornell  
Renee Gregory  
Erin McGrath  
Louie Peraertz