



March 31, 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 March 27, 2015, members of the Safety and Security in the Air Coalition (“SSAC”) met with a working group consisting of officials from various Executive Branch agencies and chaired by Adm. David Simpson, PSHSB Chief. The SSAC representatives who attended the meeting were Sara Nelson and Chris Witkowski from the Association of Flight Attendants-CWA, AFL-CIO (“AFA”), Mike McCormick and Shane Downey from the Global Business Travel Association (“GBTA”), and Brendan Danaher from the Transport Workers Union of America (“TWU”). In addition, Denny Dillard, Tim Read, and Ray Hampton from Dillard Group International (“DGI”) attended the meeting as consultants to the SSAC.

At the meeting, the SSAC 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, submitted by AFA, TWU and other organizations that form the Safety and Security in the Air Coalition (“SSAC”), to a Commission proposal that would lift a long-standing ban on using cell phones for voice and data on flights.¹ In the opinion of the SSAC 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 with significant and foreseeable adverse human and economic consequences.

The SSAC representatives proposed that the FCC’s interagency working group bring together a broad range of government and industry subject matter experts to 1) develop a research study to characterize current threats and vulnerabilities; 2) categorize threats and vulnerabilities based on future progression of technologies; 3) identify potential solutions; and 4) recommend potential regulations and standards. This proposed study would assess the full scope of potential threats and vulnerabilities and attempt to develop and evaluate appropriate mitigations in order to provide thorough information before consideration of whether or not to proceed to finalize the rule proposed in GN Docket No. 13-114.

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



Sincerely,

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

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