



December 3, 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 November 12, 2015, representatives of the Association of Flight Attendants-CWA, AFL-CIO ("AFA") and Dillard Group International ("DGI") met with Diane Cornell from the Chairman's office; PSHSB staff including Bureau Chief Adm. David Simpson, Ken Moran, and Alan Manuel; Troy Tanner, International Bureau; Julius Knapp, Chief, Office of Engineering and Technology; and Brian Regan from the Wireless Telecommunications Bureau. The AFA representatives who attended the meeting were Chris Witkowski and Dinkar Mokadam; the DGI representatives who attended were Denny Dillard and Dan Wright. Dan Johnson from the Office of the Director of National Intelligence also attended the meeting.

The FCC staff discussed the need for a federal interagency working group to promote safe and secure communications in commercial aviation. Such a working group, according to the FCC staff, would develop security protocols to ensure acceptably low cybersecurity risks using the proposed air to ground communications system contained within GN Docket No. 13-114.

The AFA and DGI representatives noted their concerns, previously expressed to the Commission in reply comments submitted by AFA and other organizations that form the Safety and Security in the Air Coalition, 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 AFA and DGI representatives, enhancements to wireless broadband communications in commercial aircraft will only increase vulnerabilities that could be exploited by terrorists, leading to heightened risks of significant and foreseeable adverse human and economic consequences to the United States aviation system.

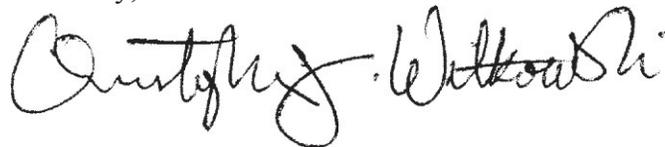
In response to the FCC's proposed interagency working group, the AFA and DGI representatives recommended establishing a permanent working group or a standing committee with a broad mandate to develop strong protocols to ensure aviation cybersecurity. The AFA and DGI representatives expressed concerns that the FCC is considering finalizing the proposal in GN Docket No. 13-114 to establish an air-ground mobile broadband service over the contiguous United States *before* such an interagency working group could develop a recommendation on whether to move forward with the proceeding. Given these concerns, the AFA and DGI

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



representatives did not express support for an FCC-led interagency working group. Instead, the AFA and DGI representatives stated that the interagency working group should be initiated and managed by an agency focused on national security. Members of the working group should include the FCC, other federal agencies, and a broad range of subject matter experts, from both the government and private sectors, in technical *and* operational aspects of cyberterrorism and cyberwarfare. Before progressing with consideration of any new or proposed airborne communications infrastructure for commercial aviation, the working group should 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 should assess the full scope of potential threats and vulnerabilities and attempt to develop and evaluate appropriate mitigations in order to provide thorough information that would inform consideration of whether or not to proceed to finalize the rule proposed in GN Docket No. 13-114.

Sincerely,

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

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