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BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

In the Matter of	)	
	)	
Amendment of Parts 73 of the	)	RM-9395
Commission's Rules To Permit	)	
the Introduction of Digital Audio	)	
Broadcasting in the AM and FM	)	
Broadcast Services	)	

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

TO: The Commission

REPLY COMMENTS OF AEROSPACE & FLIGHT TEST RADIO COORDINATING COUNCIL

Aerospace & Flight Test Radio Coordinating Council ("AFTRCC") hereby replies to certain of the comments filed in this proceeding. In particular, AFTRCC replies to suggestions that the Commission should re-open the long-closed digital audio radio ("DAR") allocations issue.

INTRODUCTION

As the Commission is aware, AFTRCC is an association of corporations engaged in the design, development, and production of aircraft, missiles, space vehicles, and weapons systems. Members of AFTRCC include, in particular, the major U.S. manufacturers of military and commercial aircraft. Given its members' role in the development, testing and production of aircraft and space vehicles, AFTRCC serves as the FCC-recognized advisory committee for coordination of flight test frequencies shared by non-Government and Government users. AFTRCC works closely with its counterpart

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Government coordinators in order to ensure prompt, efficient coordination of the referenced frequencies.

Related to its day-to-day coordination activities is AFTRCC's long and active involvement in spectrum policy issues. For example, AFTRCC initiated the private sector efforts which led to the allocation of radio spectrum for flight test telemetry. This includes notably its 1975 initiative which culminated with the allocation of the 1435-1535 MHz band (the "L-band") for flight testing. Similarly, AFTRCC successfully petitioned for regulatory changes which eliminated potential regulatory handicaps to the global competitiveness of the U.S. commercial space launch industry. AFTRCC has also represented the interests of the aerospace industry in connection with proposals which look toward reallocating U.S. flight test spectrum to other, non-aviation uses. In short, AFTRCC is well qualified to comment on matters which affect flight test spectrum allocations and utilization.

DISCUSSION

Several proponents of a low power radio service suggest that the Commission should not adopt an in-band, on-channel ("IBOC") digital system -- or at least should defer adopting such a system until it has been established that IBOC would not retard development of low power radio stations.[1] Some of these commenters go further to suggest that the Commission should re-open the spectrum allocations issue.

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[1] Citizens Media Corps; Comment of National Lawyers Guild Committee on Democratic Communications.

AFTRCC takes no position on disagreements between low power radio and IBOC proponents. Rather, AFTRCC comments briefly at this time in order to ensure that the record in this proceeding is complete with regard to the allocations issue; i.e. that the L-band is not to be viewed as an option for terrestrial DARS.

As the Commission is aware, the question of allocating L-band spectrum, in particular 1452-1492 MHz, for digital radio was considered by the Commission, the National Telecommunications and Information Administration, and the State Department prior to the 1992 World Administrative Radio Conference. Those deliberations led to a decision by the United States to preserve the L-band for the paramount purpose of flight testing. Therefore, the U.S. determined upon, and the Commission adopted, an S-band allocation for satellite DARS, i.e. 2310-2360 MHz. See Report and Order in General Docket No. 90-357, 10 FCC Rcd. 2310, 2314 (1995)(noting the "particular importance" of the aeronautical community's views on this subject). This determination has been settled national policy since 1992 and, indeed, was re-affirmed as recently as 1997. Report and Order, Memorandum Opinion and Order, and Further Notice of Proposed Rulemaking in IB Docket No. 95-91, FCC 97-70, 6 CR 978, 990, paras. 36-38. Nothing has changed in the last two years to warrant re-visiting that determination.

On the contrary, an even more compelling case exists today for preservation of the L-band for flight testing than existed in 1992. Since the early '90s, flight testing has lost no less than one-third of its spectrum inventory (65 out of 180 MHz). During this period, bandwidth demands for flight test telemetry have grown exponentially: From an average of less than 1 MHz channels, to 3 MHz, toward 5 and even 10 MHz. This trend is a function of the increasing complexity and computerization

of newer aircraft. For example, when the Boeing 707 was flight tested 40 years ago, engineers monitored 300 data points; when the 777 was tested four years ago, no less than 40,000 data points were monitored. The simple fact is that flight testing needs more spectrum, not less.

Furthermore, relocation of the large civil and military flight test infrastructure out of the L-band would cost the U.S. taxpayer and industry billions of dollars. And this does not include the consequential damage which would be inflicted on the global competitiveness of the aerospace industry -- an industry already facing serious challenges from well-financed, State-subsidized foreign competition such as Airbus.[2] Nor does it include impacts on national security from delays in the flight testing of new and modified weapons systems.

In short, there is no basis in law or in policy for the Commission to revisit the allocation issue in this terrestrial DARS context.

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[2] In 1997, the U.S. exported $32.240 billion more in aerospace products than it imported. This represented 7.3 percent of the total U.S. merchandise exports. The aerospace industry employed 858,000 persons in that year representing nearly 8 percent of the durable goods manufacturing workforce. Source: Aerospace Facts and Figure 1998/99 (Aerospace Industries Association).

For the reasons stated herein, proposals suggesting implementation of terrestrial DARS in the L-band should be rejected.

Respectfully submitted,

AEROSPACE & FLIGHT TEST RADIO
COORDINATING COUNCIL

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CERTIFICATE OF SERVICE

I, Joseph C. Fezie, hereby certify that a true copy of the attached "Reply Comments of Aerospace & Flight Test Radio Coordinating Council" has been mailed to the following by First Class United States mail, postage prepaid, this 25th day of January, 1999:

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