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FEDERAL COMMUNICATIONS COMMISSION
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May 24, 2001

VIA COURIER

The Honorable Michael Powell
Chairman
Federal Communications Commission
445 Twelfth Street S.W.
Washington, D.C. 20554

Re: 2 GHz Mobile Satellite Service
IB Docket No. 99-81
FCC File No. 179-SAT-P/L/97(16)

Dear Chairman Powell:

The Boeing Company, through its counsel, herein requests the Commission to grant without delay an unconditional authorization for Boeing's 2 GHz Mobile-Satellite Service ("2 GHz MSS") network. Boeing requires its 2 GHz MSS authorization in order to construct a global satellite network that can be used to help increase air traffic system capacity, decrease delays, and improve aviation safety. Unlike other MSS network operators, Boeing has designed its 2 GHz MSS system as a dedicated satellite-based infrastructure, which can accommodate global air traffic management, providing two-way links for air traffic communication, navigation and surveillance ("CNS/ATM").

Boeing filed its 2 GHz MSS application nearly four years ago and since then no party has questioned the substantial need and tremendous public interest benefits that would result from the grant of Boeing's application. Air traffic systems around the world are struggling to keep pace with growth in air travel in the twenty first century. Air transport is a key component of the domestic and global economy. Failure to fundamentally change the air traffic system now may leave few alternatives and have far reaching repercussions. What's needed is a global solution for long-term improvements to the safety, capacity and efficiency of the divergent air traffic systems around the world. Unfortunately, because air traffic management is highly complex with many stakeholders, the process of developing an effective, long-term solution must begin immediately.

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A fundamental feature of Boeing's plan is a satellite-based infrastructure to provide CNS/ATM to aircraft and airport facilities in every region of the world. Through the use of a global satellite network, combined with operational changes, aircraft would no longer be restricted to terrestrial-based, line-of-sight communication and navigation systems, but would be able to safely fly more direct routes using reduced spacing. The increased efficiencies would have a substantial impact on the cost of air travel, a savings that would benefit nearly every sector of the world economy. Additionally, by permitting flight crews to reach their destinations using more direct routes, the air transport industry could aid the environment by reducing aircraft emissions. Most importantly, by making available integrated, real-time communication and navigation resources in every region of the world, Boeing's system would increase the safety of air travel, ensuring that the aviation industry's long history of safety is not compromised by current growth.

In pursuing a license for its 2 GHz MSS system, Boeing has worked closely with domestic and international aviation organizations and regulators, such as the Federal Aviation Administration ("FAA") and the International Civil Aviation Organization ("ICAO"). If the Commission does not move forward with the licensing of Boeing's 2 GHz MSS network, however, a central component of Boeing's proposed solution will be compromised. Furthermore, any delays in the licensing of Boeing's system will only exacerbate the significant challenges facing the existing air traffic management system. Boeing therefore urges the Commission to reject calls for delay in the 2 GHz MSS authorization process and immediately issue an unconditional authorization for Boeing's proposed service.

Sincerely,



David A. Nall
Counsel to The Boeing Company

CERTIFICATE OF SERVICE

I, Shenita Fauntleroy, hereby certify that the attached Letter to Federal Communications Commission Chairman, Michael K. Powell, for The Boeing Company was sent on this date via hand-delivery and/or first class mail, postage prepaid, to the following:

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