



VERIZON AIRFONE

Presentation to the
Federal Communications Commission
Regarding

WT Docket No. 03-103
“Air-to-Ground Service Rules”

October 13, 2004

What's The Goal?

◆ **Broadband connectivity**

- Comparable to broadband service on the ground
- All customer segments: commercial & general aviation aircraft, passengers, airlines, government officials.

◆ **High quality and reliability**

- No risk of harmful interference
- Available “deck-to-deck”

◆ **Flexible rules**

- Promotes innovation and competition
- Permits companies to respond to market forces

How Do We Get There?

- ◆ **The Right Answer:** Auction of flexible, exclusive licenses that provide sufficient, unencumbered spectrum to deliver broadband (“CMRS model”)
 - Flexible, market-based rules will promote innovation
 - Exclusive licenses will ensure high-quality, reliable service
 - Minimum of 3 MHz (2 x 1.5) required for broadband

How Do We Get There?

- ◆ **The Wrong Answer:** Band-sharing scheme that creates significant risk of interference and impedes delivery of broadband (AirCell and Boeing proposals)
 - Significant interference potential that degrades service quality
 - Inflexible and highly prescriptive rules that would restrict technology choices and service evolution, and increase the cost of providing service
 - Specialized equipment that is not available today
 - Won't facilitate the deployment of broadband

Band-Sharing Proposals Won't Work

- ◆ Mandatory base station separation isn't practical
 - Constrains system growth and increases cost
 - Limits service around airports to one provider
 - Requires FCC to manage process
- ◆ Strict aircraft power limits won't support broadband
- ◆ Reverse banding and cross polarization would result in significant interference between competing systems
 - Navy radar would create debilitating interference to cross-duplexed system
 - Commission established current band plan to avoid this problem
 - Not possible to reliably achieve polarization isolation in a mobile environment

Auction of Exclusive Licenses Will Promote Competition

- ◆ Non-satellite companies need flexible, unencumbered spectrum to compete with existing satellite-based broadband services.
- ◆ Trying to squeeze too many competitors into too little spectrum will not promote the Commission's goals.
 - At least 3 MHz of exclusive spectrum is required @ 800 MHz
 - Made available through competitive bidding
- ◆ Commission could make available additional spectrum that can support ATG service.
 - E.g., 1915-1920 MHz / 1995-2000 MHz