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Washington, DC 20005

**Donald C. Brittingham**  
Director – Wireless/Spectrum Policy

November 16, 2004

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W., Room TW-A325  
Washington, D.C. 20554

**Re: *Ex Parte* Presentation  
WT Docket No. 03-103; “Air-Ground Telecommunications Services”**

Dear Ms. Dortch:

On November 15, 2004, representatives of Verizon Airfone met with FCC staff to discuss the Commission’s pending rulemaking on the Air-to-Ground (“ATG”) service. A list of meeting participants and a copy of the presentation are attached.

At this meeting, Dr. Jay Padgett of Telcordia Technologies reviewed his technical paper (submitted into the record on November 3, 2004) which assesses the “new” proposal made jointly by AirCell and Boeing. As Dr. Padgett described in the meeting, this proposal is not “new” at all. It continues to rely on cross-polarization to accommodate multiple ATG systems in the same spectrum, and suffers from many of the same flaws as AirCell’s earlier proposal. Dr. Padgett noted that it would not be possible to reliably maintain any level of cross-polarization isolation in the ATG environment, and as a result, the AirCell/Boeing band-sharing proposal would result in significant interference to ATG systems. Dr. Padgett noted that the problems associated with maintaining appropriate isolation levels is most significant when aircraft are flying at cruise altitudes, and not at low altitudes, as suggested by AirCell’s recent filings.

Dr. Padgett also noted that in order to achieve the isolation levels proposed by AirCell, which are insufficient to avoid interference, the two competing ATG licensees would have to work closely together to design their respective systems in a similar manner, and to avoid interference would effectively have to operate their systems as one. Such a requirement would not promote a flexible, competitive market structure for ATG.

Pursuant to Section 1.1206(b)(2) of the Commission's Rules, an electronic copy of this letter is being filed for inclusion in the above-referenced docket.

Sincerely,

/s/ Donald C. Brittingham  
Donald C. Brittingham

cc: Richard Arsenault  
Kathy Harris  
Jay Jackson  
Martha Stancill  
Gregory Vadas  
Ira Keltz  
Julius Knapp  
Salomon Sathe  
Jim Schlichting  
George Sharp

**WT Docket 03-103; Verizon Airfone Meeting with FCC on November 15, 2004**

**List of Attendees**

Richard Arsenault, Mobility Division, WTB  
Kathy Harris, Mobility Division, WTB  
Jay Jackson, Mobility Division, WTB  
Martha Stancil, Auctions & Spectrum Access Div., WTB  
Gregory Vadas, WTB  
Ira Keltz, OET  
Julius Knapp, Deputy Chief, OET  
Salomon Sathe, OET  
Jim Schlichting, OET  
George Sharp, OET

Don Brittingham, Director-Wireless/Spectrum Policy, Verizon Communications  
Bill Pallone, President, Verizon Airfone  
Robert Combs, Director, Verizon Airfone  
Tom Dombrowsky, Engineering Advisor, Wiley Rein & Fielding LLP  
Jay Padgett, Senior Scientist, Telcordia Technologies