



VERIZON AIRFONE

Presentation to
Commissioner Kevin J. Martin
Regarding

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

December 8, 2004

Airfone's Commitment to the Customer

- ◆ Airfone has a long history of serving the flying public.
 - Invested considerable capital in Air-to-Ground (ATG) network.
 - Committed to the development and growth of ATG business.
- ◆ Airfone has pushed the limits of technological capability within the bounds of current regulations.
- ◆ Customers are demanding a wider breadth of services beyond what narrowband technology permits.
- ◆ Airfone is ready, willing, and able to meet this demand if the Commission's rules permit it.

Broadband is the Goal

- ◆ Consumers want in-flight access to the same kinds of broadband services they get on the ground.
- ◆ Airlines want broadband to improve operational efficiency.
- ◆ Law enforcement agencies want broadband for safety and national security purposes.
- ◆ Broadband service must be high-quality and available from takeoff to landing (“deck to deck” service).
 - General aviation (private, military, government) is 50% of current Airfone business
 - Law enforcement needs access 100% of the time (FAMS letter of Nov. 2, 2004)

Verizon Airfone Proposal

- ◆ Operators need sufficient unencumbered spectrum to deliver broadband – that is the business imperative.
 - Flexibility to innovate and respond to market forces
 - Protection from interference that impedes delivery of high-quality advanced services to consumers
- ◆ Infrastructure vendors agree that band will only support one broadband provider without harmful interference.
- ◆ Flexible, exclusive licenses are the only way to get broadband to ATG customers. (PCS model)

AirCell / Boeing Proposal

- ◆ AirCell and Boeing propose band-sharing arrangement that relies on cross-polarization.
- ◆ Cross-polarization isolation cannot be reliably maintained, and FCC would not be able to ensure compliance.
- ◆ Cross-polarization interference will occur at cruise altitude as well as on approach to the airport, and would prevent provision of broadband ATG service.
- ◆ Achieving even this diminished level of service would require two competing providers to design and operate their systems jointly.

Conclusions

- ◆ There is a high demand for broadband ATG, and FCC rules must be changed to meet consumer demand.
- ◆ Broadband service must be high-quality and available from takeoff to landing (“deck to deck” service).
- ◆ “Exclusive use” licenses are the only way to ensure provision of broadband ATG service.
- ◆ Band-sharing scenario proposed by AirCell / Boeing would undermine delivery of broadband ATG.