

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Amendment of the Commission’s Rules to	)	WT Docket No. 04-435
Facilitate the Use of Cellular Telephones and	)	
Other Wireless Devices Aboard Airborne Aircraft	)	

**SUPPLEMENT TO THE  
REQUEST OF THE BOEING COMPANY FOR  
EXTENSION OF COMMENT DEADLINES**

The Boeing Company (“Boeing”) respectfully submits this supplement to its request for extension of comment deadlines filed on March 21, 2005 (“Extension Request”) in the above-referenced proceeding.<sup>1/</sup> Boeing requested a 45 day extension of time to May 26, 2005 to submit initial comments, and a reply comment period of 30 days, thereby making reply comments due June 27, 2005.<sup>2/</sup>

As discussed in Boeing’s Extension Request, the airborne use of cellular telephones raises challenging technical issues that affect existing and potential providers of air-to-ground services, terrestrial carriers, handset and network equipment manufacturers, and the aircraft and airline industries. Boeing argued that a thirty day comment period was insufficient to enable interested parties to develop and test the technical standards needed to ensure that the use of wireless devices during flight did not cause harmful interference to terrestrial wireless systems

---

<sup>1/</sup> *Amendment of the Commission’s Rules to Facilitate the Use of Cellular Telephones and Other Wireless Devices Aboard Airborne Aircraft*, WT Docket No. 04-435, Notice of Proposed Rulemaking, FCC 04-288 (rel. Feb. 15, 2005) (“*NPRM*”).

<sup>2/</sup> AirCell, Inc., T-Mobile USA, Inc., Cingular Wireless LLC, and Space Data Corporation authorized Boeing to represent that they supported the Extension Request. In addition, CTIA - The Wireless Association™ indicated that it did not oppose the Extension Request.

and aircraft navigation and communications systems. Boeing hereby supplements its Extension Request to supply additional details on the testing and development of technical standards currently underway, and to provide further support for its request for an extension of the comment deadlines in this proceeding.

Boeing recently received an experimental special temporary authorization (“STA”) to gather data on the use of airborne picocell technologies on aircraft during flight.<sup>3/</sup> Boeing’s experimental testing will assist the industry in assessing the potential interference issues associated with the use of picocell systems and wireless devices onboard aircraft, and will be critical to developing the technical and operational requirements necessary to mitigate any potential interference concerns associated with the provision of wireless services onboard aircraft.<sup>4/</sup> In coordination with terrestrial wireless carriers and equipment manufacturers, Boeing intends to use these tests to verify the operation of a dual-technology (CDMA2000 and GSM) picocell network both on the ground and in the air, and to demonstrate the benefits of a picocell system in limiting potential interference to terrestrial wireless networks. Similarly, Telenor Satellite, Inc., a provider of communications services via satellite, also has obtained an experimental STA to test the operation of airborne picocell technology with GSM wireless devices.<sup>5/</sup>

While the complete results of these tests may not be available for some months, extension of the comment deadlines as requested by Boeing will permit some of the conclusions to be shared with the Commission during the comment cycle. Thus, the requested extension will help

---

<sup>3/</sup> File No. 0144-EX-ST-2005, The Boeing Company Experimental Special Temporary Authorization for Call Sign WC9XCX (effective March 21, 2005).

<sup>4/</sup> *NPRM* ¶ 12 (recognizing the potential for harmful interference from the use of wireless handsets and devices onboard airborne aircraft).

<sup>5/</sup> File No. 0157-EX-ST-2005, Telenor Satellite, Inc. Experimental Special Temporary Authorization for Call Sign WC9XBE (effective May 1, 2005).

ensure the accuracy and completeness of the data requested by the Commission,<sup>6/</sup> and will give other parties ample opportunity to comment on the information submitted to the Commission.

In the *NPRM*, the Commission recognizes the potential for an industry-developed standard to be used to guard against harmful interference to aircraft communications and navigation systems as well as to terrestrial wireless systems.<sup>7/</sup> To that end, like other interested parties, Boeing has been engaged in discussions with terrestrial wireless carriers and equipment manufacturers regarding the technical and operational issues associated with the use of wireless devices onboard aircraft. Boeing is hopeful that these discussions will help facilitate an industry-wide consensus regarding the most appropriate standards needed to protect both terrestrial wireless services and aircraft systems while facilitating the use of wireless devices during flight. Grant of Boeing's Extension Request would ensure that ample time is allotted to these discussions.

Accordingly, for the reasons set forth above and in Boeing's Extension Request, grant of Boeing's request would serve the public interest by allowing commenters sufficient time to address the important issues raised in the rulemaking proceeding and would provide the

---

<sup>6/</sup> *NPRM* ¶ 12 (noting that the Commission is not prepared to allow the use of wireless devices onboard airborne aircraft "without the further development of the record on possible technical solutions").

<sup>7/</sup> *NPRM* ¶ 4.

Commission with a more complete record on which to base its decisions.

Respectfully submitted,

**THE BOEING COMPANY**



Carlos M. Nalda  
Connexion by Boeing<sup>sm</sup>  
1200 Wilson Blvd  
MC RS-00  
Arlington, VA 22209  
(703) 465-3321  
carlos.m.nalda@boeing.com

---

Howard J. Symons  
Angela F. Collins  
Mintz, Levin, Cohn, Ferris, Glovsky and  
Popeo, P.C.  
701 Pennsylvania Ave., N.W., Suite 900  
Washington, D.C. 20004  
(202) 434-7300  
hjsymons@mintz.com  
afcollins@mintz.com

Its Attorneys

Dated: March 31, 2005