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May 17, 2005

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street SW
Washington, DC 20554

Subject: Northwest Airlines, Inc. Comments to Notice of Proposed Rulemaking
FCC Docket Number WT 04-435

Amendment of the Commission's Rules to Facilitate the Use of Cellular
Telephones and other Wireless Devices Aboard Airborne Aircraft

Dear Ms. Dortch:

Northwest Airlines, Inc. (NWA) is pleased to provide the following comments in response to the Federal Communications Commission's notice of proposed rulemaking ("NPRM") regarding the use of cellular telephones and other wireless devices on airborne aircraft. 70 Fed. Reg. 11916 (March 10, 2005).

NWA generally agrees with the Commission's proposal to lift the prohibition on the use of transmitting portable electronic devices ("T-PEDs") onboard aircraft so long as the aircraft are equipped with systems capable of ensuring that the T-PEDs will not operate at their greatest power settings and thereby create interference with terrestrially-based communications systems. To the extent that the use of a T-PED on an airborne aircraft will not generate such interference, the Commission should allow their use if, in the judgment of the Federal Aviation Administration and the airlines, those devices can be used safely without interfering with aircraft systems.

We believe that the marketplace should ultimately decide whether or not T-PED's will actually be used on airborne aircraft and that the available technologies dictate the equipment that is used.

However, NWA urges the Commission to address the following important issues before issuing its final rule.

- The Commission's rules should be amended to address the onboard operation of all types of T-PEDs, not only those operating in the 800 MHz cellular spectrum covered by

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47 C.F.R. Part 22. As the Commission itself noted in the NPRM, some T-PEDs use more than one spectrum and most airline passengers today do not know which spectrum bands their respective T-PEDs use. By making its rules uniform across all of the possible spectrum bands used by T-PEDs, the Commission would establish a useful framework for the further development, testing, and possible use of pico cell technologies on aircraft.

- The Commission should retain the operational standards approach reflected in Proposed Section 22.925. It clearly is preferable for the Commission to require that the technologies used on the aircraft be capable of preventing interference to terrestrial systems than for the Commission to specify that a certain type of existing technology must be used. Advances in technology occur so rapidly that establishing operational standards gives the industry the flexibility that it really needs to be able to work with new technologies as they are developed.
- The Commission should not require aircraft operators to obtain a spectrum license or enter into a contract with a spectrum licensee for the purpose of using any communications spectrum within an aircraft. Spectrum licenses should be relevant only with respect to aircraft-to-ground communications, and the Commission should leave this open to licensees nationwide so that the market for providing such services for aircraft operators and their passengers will be as competitive as possible

NWA looks forward to working with the Commission, the FAA, and RTCA, Inc. going forward as the T-PED/pico cell technologies are further developed and tested. It is, of course, of paramount importance that the use of T-PEDs onboard aircraft not interfere with aircraft systems, as well as not interfere with terrestrially-based systems. The Commission, FAA, and other stakeholders need to work together as onboard systems are developed to ensure that any technical problem experienced by a pico cell or by an individual T-PED can be handled without any adverse effect on the critical aircraft systems or terrestrially-based systems and that, if necessary, flight crews will receive timely notice whenever such problems arise.

Sincerely,



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