Marlene S. Dortch
Secretary
Federal Communications Commission
c/o Natek, Inc.
236 Massachusetts Avenue NE
Suite 110
Washington, D.C. 20002

Re: IB Docket No. 04-286

Dear Ms. Dortch:

Cessna Aircraft Company submits these comments in response to the Public Notice dated September 21 inviting comment on recommendations approved by the Commission's WRC Advisory Committee. In particular, Cessna takes this opportunity to express its strong support for the document dealing with Agenda Item 1.5 on aeronautical telemetry (WAC/064).

Cessna is the world's largest manufacturer of General Aviation aircraft in the small business jet and light aircraft categories. In a period spanning seven decades, Cessna has developed hundreds of aircraft models, and currently offers nineteen models of certified aircraft with more in development. Cessna is a global presence with over 11,000 employees worldwide, and facilities in Europe and eleven U.S. cities.

In 2004, Cessna sold 897 General Aviation aircraft, of which approximately forty percent went to international customers. The General Aviation market is increasingly competitive. Recent years have witnessed the birth of many new aircraft manufacturers, international and domestic. In turn, this puts increasing pressure on Aeronautical Mobile Telemetry (AMT) spectrum for Flight Test, as it must be shared by an increasing number of users. Factors such as logistics, and suitable airports and airspace to conduct Flight Test operations work to limit the number of locations suitable for aircraft development and manufacturing.

Wichita, Kansas is home to four aerospace companies. Cessna must share AMT spectrum with Boeing, Bombardier Flight Test Center and Raytheon Aircraft. Cessna currently has eleven aircraft instrumented for telemetry operations with ground equipment and personnel capable of supporting up to three simultaneous flights. All four companies now coordinate with each other for AMT spectrum, sometimes on a daily basis. As our spectrum needs increase, coordinating sufficient spectrum for all of our companies is a growing challenge. In the foreseeable future, without additional AMT spectrum, our ability to develop and market new aircraft models, or even to certify block point changes in a timely manner could be greatly diminished.

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A typical flight test program to develop and certify one model can last up to two years. Depending upon the program, a one-day delay in one program can cost $200,000. During the same time period in which one third of AMT spectrum in the L and S-bands was reallocated, Cessna's data rates increased over 3,000 percent. This figure does not include AMT spectrum used for video, which is a necessity for some missions. The increase in data rates has been driven by increasingly complex avionics systems, and general requirements for more parameters with higher sample rates and greater accuracy. These factors are essential to the development of quality, fuel efficient, high performance General Aviation aircraft that can compete in today's market place.

In all probability, the future success of Cessna and the U.S. aerospace industry will hinge upon an adequate supply of AMT spectrum. Cessna agrees with and supports the proposed preliminary view as published.

Cessna Aircraft Company respectfully requests that the Commission adopt the preliminary view. Further, Cessna entreats the Commission and its staff to lend aid and assistance to U.S. manufacturers in advancing the U.S. position at WRC-07.

Sincerely,

By _____
David Brant

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