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October 3, 2005

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:

Bombardier Learjet 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, Learjet Inc. takes this opportunity to express its strong support for the document dealing with Agenda Item 1.5 on aeronautical telemetry (WAC/064).

Bombardier Aerospace is a world leader in the design and manufacture of innovative aviation products for the business, regional, and amphibious aircraft markets, employing approximately 26,000 people worldwide. The US subsidiary, Learjet Inc., with Headquarters located in Wichita, Kansas provides employment to approximately 3,500 people throughout the US. Additionally, Wichita provides facilities for manufacturing of the Learjet Series business aircraft and the Flight Test Center for all aircraft manufactured by Bombardier Aerospace.

Flight test and airworthiness certification is an extremely expensive part of the total cost of developing new and modified aircraft. The flight test process can range from several months to several years. The process is not only costly in terms of expenditures and infrastructure requirements, but it also directly impacts the time-to-market.

US manufacturers are under increasing pressure from foreign competition. This competition shows no signs of slackening. On the contrary, it will intensify. In addition, the commercial business jet market also faces intense international competition. In an environment such as this, it is imperative that American manufacturers have the resources necessary to reduce costs and offer customers greater economy over the aircraft life cycle.

Faced with these factors, Learjet Inc. views with increasing concern the shrinking supply of telemetry spectrum. This trend is driven primarily by the fact that more and more data must be gathered on the performance of the increasingly complex systems and sub-systems aboard aircraft. New composite materials, enhanced passenger electronic systems, and higher performance standards (particularly with escalating fuel costs) demand the transmission of enormous amounts of data in order to ensure that the aircraft will perform as designed and that all safety margins are satisfied. High definition video transmission is also increasingly a part of these transmission requirements. Thus, the trend is not only in the direction of more spectrum being required in the aggregate, but also more of that spectrum being required for wideband use, e.g. on the order of 20 MHz.

This trend is exacerbated by the loss of one-third of the flight test telemetry inventory in the past 15 years. Reallocations combined with escalating data rates have produced a shortfall in telemetry spectrum in congested areas. According to a study produced by Sarnoff Corporation, nearly 20 percent of U.S. test flights are being delayed simply for lack of spectrum. This entails a major penalty for the competitiveness of US manufacturers.

The proposed preliminary view addresses the importance of securing internationally harmonized spectrum; offers preliminary ideas regarding specific regulatory means for satisfying the Agenda Item; and sets forth US notions regarding the use of the new spectrum, e.g. for downlinks and not for safety-related communications. It is an important next step toward success for the US aerospace industry at WRC-07.

Learjet Inc. urges adoption of the preliminary view by the Commission. No less important, it further urges the Commission and its staff to assist US manufacturers in overcoming the inevitable obstacles that the US will encounter as we press ahead to WRC-07.

Sincerely,



Larry Dufrainmont  
Director Flight Test and Flight Operations  
Bombardier Aerospace