



Washington, DC 20005

Donald C. Brittingham
Director – Wireless/Spectrum Policy

October 26, 2005

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W., Room TW-A325
Washington, D.C. 20554

**Re: *Ex Parte* Presentation
WT Docket No. 03-103; “Air-Ground Telecommunications Services”**

Dear Ms. Dortch:

On October 25, 2005, Bill Pallone, President of Verizon Airfone, Leslie Owsley, Assistant General Counsel for Verizon, and the undersigned met with Commissioner Kathleen Abernathy and her legal advisor, John Branscome, to discuss the above-captioned proceeding.

Verizon Airfone discussed AirCell’s petition for reconsideration which requests that the Commission shorten the transition period for Airfone to reconfigure its current air-to-ground (“ATG”) system to operate in only 1 MHz of spectrum. As Airfone has previously explained, in order to accomplish such a transition, Airfone must individually visit each ground station tower site to retune antennas, deploy modified software, and install customized emission filters. In addition, equipment must be modified on more than 4,200 aircraft. More than 3,000 of these are privately-owned aircraft which cannot be modified remotely but must be taken out of service for equipment modifications. While Airfone has done advance work to prepare for this transition, much of the work can only occur once the winning band plan under the auction is known. As a result, Airfone indicated that the transition process is likely to take the full 24 months allotted by the Commission in its Order. Consequently, Airfone urged the Commission to reject AirCell’s recommendation to shorten this period to six months.

Pursuant to Section 1.1206(b)(2) of the Commission’s Rules, an electronic copy of this letter is being filed for inclusion in the above-referenced docket.

Sincerely,

/s/ Donald C. Brittingham

Donald C. Brittingham

cc: Commissioner Kathleen Abernathy
John Branscome