



September 15, 2006

VIA ECFS

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

Re: **Biennial Review 2006; WT Docket No. 06-156**

Attn: Wireless Telecommunications Bureau

Dear Ms. Dortch:

In response to the Commission's request for comment in this proceeding,¹ PCIA – The Wireless Infrastructure Association (“PCIA”) respectfully requests that the Commission commence a rulemaking to modernize and enhance Part 17 of its rules. In support thereof, PCIA is attaching its Petition for Rulemaking to revisit the Part 17 rules, filed on September 12, 2006.

As background, since the last substantive revision of Part 17 in 1995, lighting and monitoring technologies have developed rapidly and improved the tools available to the Commission to improve safety to air navigation and encourage investment in new and safer technology through regulation. Based on these technological advances, as well as the experiences of PCIA and its members with the current rules and changes in FAA requirements, PCIA has encouraged the FCC to revisit its Part 17 rules. The Wireless Telecommunications Bureau agreed, “recommend[ing] that the Commission initiate a proceeding in part to consider the specific recommendations of PCIA and others with respect to Part 17.”² Consistent with this recommendation, PCIA encourages the Commission to promptly institute a proceeding to reexamine the Part 17 rules, consistent with the attached petition.

We appreciate your consideration of this request. Please let us know if you have any questions or need additional information regarding this request.

¹ *Public Notice*, “The Commission Seeks Public Comment in the 2006 Biennial Review of Telecommunications Regulations,” FCC 06-115 (rel. Aug. 10, 2006).

² *2004 Biennial Regulatory Review, Wireless Telecommunications Bureau Staff Report*, 20 FCC Rcd 124, 160 (WTB 2005).



Respectfully Submitted,

/s/ Anne M. Perkins
Michael Fitch
President and CEO
Andrea Bruns
Director of Government Relations
Anne M. Perkins
Manager, Industry Affairs

Attachment