

June 30, 2008

VIA ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

**Re: The Boeing Company
Written Ex Parte Presentation
IB Docket Nos. 05-20 and 07-101**

Dear Ms. Dortch:

The Boeing Company (“Boeing”), by its attorneys, herein provides the Commission with further support to expeditiously adopt rules for aeronautical mobile-satellite services (“AMSS”) that mirror those that the Commission proposed for vehicle-mounted earth stations (“VMES”) that operate with the Fixed-Satellite Service (“FSS”) in the Ku-band.¹

On May 27, 2008, the Commission released a Public Notice seeking opposition or support for a petition for rulemaking filed by Utilities Telecom Council and Winchester Cator LLC (“UTC-Winchester”) to amend Parts 2 and 101 of the Commission’s Rules to add a secondary fixed service allocation in the 14.0 – 14.5 GHz satellite band. This proposal for a secondary allocation provides further basis and increased urgency for the Commission to address Boeing’s proposal in the VMES proceeding to designate aircraft-mounted earth stations as an application of the primary FSS allocation.

Currently, AMSS networks authorized by the Commission operate on either a secondary or experimental basis in the 14.0 – 14.5 GHz band. Such services would receive harmful interference from the proposed UTC-Winchester services because the proposed increase in the noise floor would degrade

¹ Amendment of Parts 2 and 25 of the Commission’s Rules to Allocate Spectrum and Adopt Service Rules and Procedures to Govern the Use of Vehicle-Mounted Earth Stations in Certain Frequency Bands Allocated to the Fixed-Satellite Service, IB Docket No. 07-101, *Notice of Proposed Rulemaking*, FCC 07-86, (May 15, 2007).

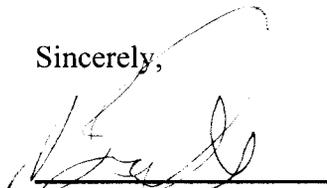
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the AMSS signal, force a reduction in data rate to maintain the signal, and ultimately eliminate the utility of the broadband aeronautical service. Further, AMSS networks would not be able to protect the proposed UTC-Winchester services, calling into question the ability of the UTC-Winchester service to operate effectively in the band.

Boeing has attached to this letter a copy of its Opposition that was filed in the UTC-Winchester Petition docket. This Opposition provides greater detail regarding the above-discussed issues. Boeing requests that the Commission include its Opposition in the record for IB Docket Numbers 05-20 and 07-101.

Thank you for your attention to this matter. Please let us know if you have any questions.

Sincerely,



Bruce A. Olcott
Joshua T. Guyan

Attachment