GAMA 08-31

15 August 2008

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

Subject: Ex Parte Statement - ET Docket No. 08-59
GAMA Comments on GE Healthcare Proposal

Dear Ms. Dortch:

The General Aviation Manufacturers Association ("GAMA") hereby submits comments concerning the issues presented in the above-referenced proceeding, a proposal by GE Healthcare (GEH) for a secondary allocation in the 2360-2400 MHz band. This proposal would cause harmful interference to important flight test operations currently allocated in this band. It would also jeopardize medical telemetry. Therefore, the GEH proposal is fundamentally flawed and should be dismissed without further consideration.

By way of background, GAMA is an international trade association headquartered in Washington, DC representing over 60 of the world's leading manufacturers of general aviation airplanes, engines, avionics and related equipment. GAMA's member companies design, prototype, flight test, and manufacture over 90% percent of the world's certificated general aviation airplanes with billings of over $21 billion in 2007. In addition, aerospace is the leading contributor to a positive balance of trade for the United States and general aviation continues to show strong growth over the past several years and into the foreseeable future. A list of GAMA member companies is enclosed for your information.

The Commission has invited comment on a proposal by GE Healthcare ("GEH") for a new spectrum allocation for a Medical Body Area Network Service ("MBANS") in the band 2360-2400 MHz. While GAMA appreciates GEH's view that an MBANS allocation could provide benefits, any benefits will prove illusory if MBANS is located in a band where it is incompatible with existing users. This is the case with the proposal to locate MBANS in 2360-2400 MHz.

Three-quarters of the band in question (i.e., 2360-2390 MHz) has long been allocated exclusively for purposes of aeronautical telemetry collected during the flight testing of aircraft and missiles. It is an essential resource for GAMA members, that provides a real-time link between test pilots and ground-based engineers. It is integral to enhancing the safety of flight testing which, by its very nature, will always be an enterprise fraught with risk. It is equally integral to the productivity and global competitiveness of GAMA members as they seek to introduce multiple new models of aircraft in the coming years.

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The record developed by the Aerospace and Flight Test Radio Coordinating Council ("AFTRCC") shows persuasively the risk of interference to both flight test telemetry and MBANS devices. GAMA fully endorses and adopts as its own the comments submitted by AFTRCC. Interference to patient telemetry could be caused by test aircraft on take-off and landing, for example, but especially by new technologies which GAMA members will be looking to implement in the coming years. Those technologies will enable companies to dynamically adjust the amount of spectrum available to the test aircraft transmitters for any specific test parameter. Such technologies could entail uplink power levels in the range of hundreds of watts, and would wipe out MBAN use for miles around any flight test center, many of which are located close to urban areas.

Likewise, MBANS use would inflict interference on flight test telemetry given the extraordinary sensitivity of tracking antennas used at flight test centers. This introduces a serious risk for safety-related aviation spectrum, not to speak of inordinate cost to U.S. industry from having to fly (and re-fly) the same maneuvers over and over in order to secure uncorrupted data (or even any data at all).

Most importantly, MBANS operation can not be controlled. Patients travel and MBANS use could occur anytime and at anyplace MBANS-equipped patients are located: At home, at work, at play, etc. Thus, the proposed allocation is a prescription for problems between two safety-related services.

In light of the above, GAMA strongly urges the Commission to promptly reject the GEH proposal.

GAMA appreciates the opportunity to provide an ex parte statement on behalf of the global general aviation airplane manufacturers that perform aircraft engineering and flight testing in the U.S. Please contact Walter Desrosier at wdesrosier@gama.aero or (202) 393-1500 if there are any questions or comments.

Sincerely,

Walter Desrosier
Vice President, Engineering & Maintenance

cc: The Honorable Kevin J. Martin, Chairman
The Honorable Michael J. Copps
The Honorable Jonathan S. Adelstein
The Honorable Deborah Taylor Tate
The Honorable Robert M. McDowell

January 2008

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About GAMA

The General Aviation Manufacturers Association (GAMA) is an international trade association headquartered in Washington, DC representing over 60 of the world's leading manufacturers of general aviation airplanes, engines, avionics and related equipment. GAMA's members also operate fleets of aircraft, fixed based operations, and pilot training and maintenance training facilities.

Purpose
The purpose of GAMA is "to foster and advance the general welfare, safety, interests and activities of general aviation."

GAMA Member Companies

Airplane Manufacturers
- Adam Aircraft
- Boeing Business Jets
- Bombardier Aerospace
- Cessna Aircraft Company
- Cirrus Design Corporation
- Dassault Falcon Jet
- Diamond Aircraft Industries
- EADS Socata
- Eclipse Aviation
- Embraer Aircraft Holding Inc.
- Gulfstream Aerospace
- Hawker Beechcraft Corp.
- Mooney Aerospace Group
- Piaggio Aero Industries
- Pilatus Aircraft, Ltd.
- Piper Aircraft, Inc.
- Sabreliner Corporation
- SINO Swearingen

Engine Manufacturers
- GE Aviation
- Honeywell Aerospace
- Lycoming Engines
- Pratt & Whitney Canada
- Rolls-Royce North America
- SMA Aircraft Engines
- Teledyne Continental Motors
- Thielert Aircraft Engines
- Williams International

Avionics Manufacturers
- Aero-Mach Labs
- Aspen Avionics
- Avidyne Corporation
- Century Flight Systems
- Garmin International
- Honeywell Aerospace
- Innovative Solutions & Support
- L-3 Communications
- Meggitt Aerospace Equip.
- Rockwell Collins, Inc.
- S-Tec
- Safe Flight Instrument Corp.
- Universal Avionics Systems

Component Manufacturers & Service Providers
- Aircraft Technical Publishers
- Airtechnics Inc.
- Aviall
- B/E Aerospace, Inc.
- BRS Parachutes
- CAE SimuFlite
- Crane Aerospace and Electronics
- DeCrane Aerospace
- Dukes Inc.
- Eaton Corp.
- FlightSafety International
- Goodrich Corporation
- Hamilton Sundstrand
- Hartzell Propellers Inc.
- Jeppesen
- Jet Aviation
- Kelly Aerospace, Inc.
- Meggit Vibro Meter
- The NORDAM Group
- Parker Hannifin Corporation
- PPG Aerospace
- Precision Products
- Triumph Group
- Woodward Governor