



August 18, 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:
AIA Comments on GE Healthcare Proposal**

Dear Ms. Dortch:

Aerospace Industries Association (AIA) hereby submits comments concerning 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 and would also jeopardize medical telemetry. We request the GEH proposal be dismissed without further consideration.

The Aerospace Industries Association is the premier trade association representing the nation's leading aerospace and defense manufacturers. More than 100 major aerospace and defense companies are members of the association, embodying every high-technology manufacturing segment of the U.S. aerospace and defense industry from commercial aviation and avionics, to manned and unmanned defense systems, to space technologies and satellite communications.

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. AIA appreciates GEH's view that an MBANS allocation could provide benefits, however, any benefits will be misleading if MBANS is located in the band 2360-2400 MHz.

Most of this band (2360-2390 MHz) has long been allocated exclusively for purposes of collecting telemetry during the flight testing of aircraft and missiles. It is an essential resource for AIA members, providing a real-time link between test pilots and ground-based engineers. It is integral to enhancing the safety of flight testing which will always be a high-risk endeavor. Additionally, it is integral to the productivity and global competitiveness of AIA members as they seek to introduce new models of aircraft.

The record developed by Aerospace and Flight Test Radio Coordinating Council ("AFTRCC") shows persuasively the incompatibility of flight test telemetry and MBANS. Interference to

patient telemetry could be caused by test aircraft on take-off and landing, for example, but especially by new technologies which AIA members will be looking to implement in the coming years. Those technologies will enable companies to achieve further increases in spectrum efficiency by dynamically adjusting 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. They would cause destructive interference to MBANS 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 in addition to excessive costs U.S. industry would incur with additional procedures in order to secure uncorrupted data.

Most importantly, MBANS operation can not be controlled. MBANS use could occur anytime, any place 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.

We trust adequate information has been provided above for a favorable consideration of the Commission to reject the GEH proposal. If you have any questions, please contact Rane Carr (raneecarr@aia-aerospace.org). A copy of this letter is being submitted for the Commission's Docket.

Best regards,



Dan Elwell
Vice President, Civil Aviation

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