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August 12, 2008

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

**Subject: Ex Parte ET Docket No. 08-59
Bell Helicopter Textron Comments on GE Healthcare Proposal**

Dear Ms. Dortch

Bell Helicopter Textron hereby submits comments concerning a proposal by GE Healthcare (GEH) for a secondary allocation in the 2360 – 2400 MHz band. This allocation would have negative impact on our ability to conduct Telemetry test flights on our four existing allocated frequencies in the requested band.

The need for these frequencies has become increasingly important to Bell Helicopter due to Telemetry transmission interference with test aircraft from Lockheed Martin and Bell Helicopter operating simultaneously in the Dallas Fort Worth area on L-Band frequencies. The long term solution for Bell is to move more of the tests to the S-Band frequencies in order to eliminate interference between Bell and Lockheed Martin TM aircraft.

Medical Body Area Network Service request to operate in the band 2360 – 2400 MHz will create a conflict with TM test operations data acquisitions and the test aircraft transmissions may interfere will the MBANS transmissions.

Currently Bell Helicopter and Lockheed Martin flight test operations are working together to plan test flights and frequencies used to minimize potential interference. MBANS transmissions cannot be controlled and could occur at any time making test transmissions subject to interference without warning.

Based on the information provided we trust that a favorable consideration of the Commission be to reject the GEH proposal.

Sincerely,

Hugh Ward
Director Aircraft Test & Evaluation
Bell Helicopter Textron

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