

October 20, 2008

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

Re: Application of Row 44, Inc. (Call Sign E080100)  
IBFS File Numbers SES-LIC-20080508-00570, SES-AMD-20080619-00826,  
SES-STA-20080711-00928, SES-STA-20080811-01049, SES-AMD-20080819-01074,  
SES-AMD-20080829-01117 and SES-STA-20080903-01141 and  
IB Docket Nos. 07-101 and 05-20

Dear Ms. Dortch:

On October 15, 2008, the Boeing Company (“Boeing”), by its attorneys, filed a letter with the Commission addressing the above-referenced dockets and file numbers. The primary intent of the letter was to raise awareness within the Commission regarding the critical need to adopt rules and policies for the licensing and operation of aeronautical mobile-satellite services (“AMSS”) in the United States.

Boeing’s letter also addressed the pending applications of Row 44, Inc. for Commission authority to operate an AMSS network. Boeing’s letter identified apparent technical concerns regarding Row 44’s proposed operations and requested that the Commission refrain from granting Row 44’s applications until those concerns are addressed adequately in these proceedings.

Boeing has since been told by Row 44 that the technical issues identified in Boeing’s letter have already been addressed fully by Row 44 in its various submissions to the Commission. In its capacity as a manufacturer of aircraft, Boeing has agreed to participate in an information exchange and discussion with Row 44 to verify its compliance with regulatory guidelines and requirements for AMSS. Boeing wishes to support Row 44 and potentially other suppliers of AMSS to provide to the public these communication services. Further delay in approval of AMSS rules and issuance of authorizations for AMSS providers is ultimately detrimental to the airlines, and the flying public.

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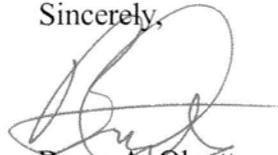
Page 2

Boeing believes that it is inappropriate for the technical objections that Boeing expressed in its October 15th letter to be considered by the Commission while Boeing's discussions with Row 44 are ongoing. Boeing therefore seeks to withdraw the concerns that it expressed regarding Row 44's applications.

Boeing, however, remains convinced that the only way to prevent further confusion and disagreement regarding the appropriate rules and policies for AMSS networks is for the Commission to adopt expeditiously application processing and service rules that are applicable to this critically important and rapidly growing service.

Thank you for your attention to this matter. Please contact the undersigned if you have any questions.

Sincerely,



Bruce A. Olcott