

November 3, 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. Although the letter focused predominantly on the long-pending rulemaking regarding aeronautical mobile-satellite services (“AMSS”) in the United States, the letter also addressed the pending AMSS applications of Row 44, Inc.

Shortly after filing its letter, Boeing agreed to participate in an information exchange and discussion with Row 44 regarding its technical approach to achieve compliance with the Commission’s requirements for AMSS licensees. Concurrently, Row 44 filed with the Commission on October 23, 2008 an additional pleading and technical appendix that provided significant further detail on the techniques that Row 44 intends to use to ensure that its AMSS network is not a source of harmful interference to authorized users of the Ku-band.

Boeing has reviewed these materials and has discussed them with Row 44. Based on its extensive experience and expertise in AMSS network design and the information made available, Boeing has concluded that the technical and operational measures that Row 44 described in its October 23, 2008 submission should obviate the concerns that Boeing expressed regarding harmful interference to authorized users of the 14.0 – 14.5 GHz band.

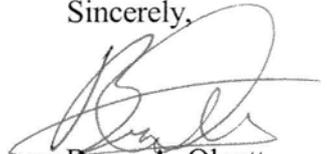
Row 44 has also sought special temporary authority ("STA") from the Commission to conduct technical trials that should provide additional insight regarding the interference avoidance capabilities of its AMSS network design. Boeing has been informed that Row 44 is already conducting successful laboratory and field tests of its system using other Commission and Canadian authorizations. Boeing believes that granting Row 44 the requested STA should provide further assurance to the Commission and the satellite industry regarding the capabilities of Row 44's AMSS technology.

As Boeing has repeatedly indicated in this and other pending proceedings, AMSS networks are intended to serve a large and unmet need within the aviation industry for in-flight access to broadband services that can enable airline passengers and crew to use their time in a more productive and enjoyable manner. Several companies are already licensed by the Commission to operate AMSS networks in the United States. Boeing anticipates that additional companies will seek to introduce their own AMSS networks in the future. Thus, processing Row 44's STA and full license request is in the best interests of the aviation and satellite industries, as well as the traveling public.

For future applicants, Boeing urges the Commission to adopt rules and procedures that clearly identify the filing requirements that should be followed in order to ensure that AMSS applications are processed and granted in an expeditious manner. The objective requirements that are sought by the satellite and aviation industries can best be achieved by the immediate adoption of service rules for AMSS networks as a part of International Bureau docket numbers 05-20 and 07-01.

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

Sincerely,



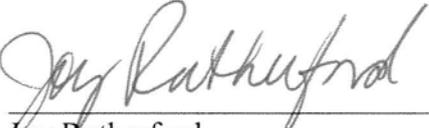
Bruce A. Olcott

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Letter from Bruce A. Olcott, counsel to The Boeing Company, to Marlene H. Dortch, Secretary, Federal Communications Commission, dated November 3, 2008, was mailed by first class mail, postage pre-paid, on this 3rd day of November, 2008 to the following:

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Joy Rutherford