



*Detect the Difference*

Statement in Support of the Petition's request to initiate a rulemaking proceeding.

Date: December 15, 2008

To: Federal Communications Commission

From: Sensis Corporation

Ref: Amendment of Sections 87.131, 87.133, 87.137, 87.173, and 87.349 of the Commissions' Rules Regarding Aeronautical Utility Mobile Stations - Petition for Rulemaking of the National Telecommunications and Information Administration

RM-11503

As the Prime contractor and design agent for the ASDE-X system, Sensis agrees in principal with the Federal Aviation Administration (FAA) that this application will improve runway safety. Sensis also has developed its second generation of vehicle transponder devices and had deployed hundreds of these devices internationally. Sensis also markets these products in the US to airports and airlines in advance of the government's licensing of these products and expects hundreds of sales once licensing is permitted. Without exception, Sensis has observed overwhelming support by airports and airlines for capabilities that enhance the ASDE-X system's ability to identify snowplows, emergency vehicles and maintenance vehicles that operate in the movement area. This Amendment would facilitate both vendor and user support for these capabilities.

Sensis Corporation conditionally supports the National Telecommunication's and Information Administration's (NTIA) petition for rulemaking to amend 47 C.F.R. Part 87 to allow Aeronautical Utility Mobile Stations to use the 1090 MHz Frequency to runway vehicle identification and collision avoidance. Sensis agrees with all of the proposed amendments with the following exceptions:



Exception to amendment 4

*Add a frequency stability requirement of 1 part per million for Aeronautical Utility Mobile Stations operating on 1090 MHz (Section 87.133(a)(7));*

Sensis Comment:

Sensis proposes that the stability requirement be changed to 1090Mhz +/- 1 MHZ which is approximately one part per thousand.

Rationale:

Our proposed stability requirement comes from the RTCA DO-181C Mode-S MOPS, section 2.2.3.1. This application of the use of 1090MHz does not need to be more stringent.

Exception to amendment 7c

*limit the licensing to only those locations that are within the vicinity of an FAA ASDE-X multilateration system or ADS-B equipment, and/or where the primary purpose for seeking transmit authorization is to provide surface data to aircraft and air traffic control authorities*

Sensis Comment:

Sensis proposes that the language be more specific to explicitly prohibit use when a vehicle is not in the movement area.

Rationale:

There may be a tendency for operators to want to use this spectrum for uses other than vehicle and aircraft safety at an airport. An example would be tracking baggage carts to achieve operational efficiencies in the Gate/Apron areas of an airport. Use of this spectrum should be specific to enhancing identification of vehicles and aircraft operating on the airport movement area.

Exception to amendment 7d

*7d limit transmissions to a maximum of twice per second if the vehicle is in motion or a maximum of once every five seconds if the vehicle is stationary.*

Sensis Comment:

The message transmission rates are not consistent with the DO-260A ADS-B MOPS.  
The amendment should be changed to:

<b>ADS-B Message</b>	<b>Rate when Moving</b>	<b>Rate when Stationary</b>
Surface Position Message (types 5, 6, 7 and 8)	Every 0.4 to 0.6 seconds	Every 4.8 to 5.2 seconds
Aircraft Operational Status (type 31)	Every 4.8 to 5.2 seconds	
Aircraft Identification and Type (Type 2)	Every 4.8 to 5.2 seconds	Every 9.8 to 10.2 seconds

Rationale:

The amendment as proposed does not distinguish between position, status, and Aircraft identification messages as it is proposed in the DO-260A MOPS. Sensis' proposed language aligns with the DO-260A MOPS and still is consistent with the intent of the NTIA proposed language.

In conclusion, Sensis supports the initiatives of the FAA and the NTIA and also asks the Commission to modify Part 87 to permit the implementation of 1090MHZ vehicle squitters with the National Airspace System. It is also critical that the Federal Communication Commission include Sensis's changes and comments. Delays in implementing this amendment, with Sensis' proposed changes, only delay the deployment of this vital safety enhancement to ASDE-X.

Sincerely,

Antonio Lo Brutto

