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December 11, 2008

Ms. Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th St., S.W.
Washington, D.C. 20554

Received & Indexed
DEC 17 2008
FCC Mail Room

Re: FCC RM-11503

Dear Ms. Dortch:

The Massachusetts Port Authority ("Authority") is an independent authority of the Commonwealth of Massachusetts. It owns and operates Boston-Logan International Airport ("Boston-Logan"). Boston-Logan is the busiest commercial airport in New England and has been designated by the Federal Aviation Administration ("FAA") as one of 35 critical airports of the national airspace system. The Authority submits these comments in support of the proposed amendment to FCC regulations described in RM-11503.

Airport safety and security are the Authority's highest priorities and includes efforts to reduce the number and frequency of runway incursions. Working with the FAA, we have developed a strategic plan to reduce the frequency of runway incursions and to enhance the safety of our airfield operations. A critical tool that we have identified, and that the FAA is currently installing at Boston-Logan and at a number of other airports, is the Airport Surface Detection Equipment, Model X (ASDE-X), the latest generation of ground radar technology. The ASDE-X radar will allow FAA air traffic controllers and the Authority's airport operations personnel to see and monitor, in real time, ground vehicles and aircraft on the airfield's taxiways and runways as well as in the local airspace, in any weather condition and with a very high degree of accuracy. A critical component of ASDE-X effectiveness is its ability to incorporate data inputs from transponder-equipped (ADS-B) objects, both aircraft and ground vehicles.

Similar to other major commercial airports, Boston-Logan's airfield accommodates a large number and variety of ground vehicles including automobiles, trucks, snow plows, maintenance vehicles, law enforcement vehicles, construction equipment, and fire fighting apparatus. The ability to track these vehicles as an integral part of the ASDE-X

Operating

Boston Logan International Airport • Port of Boston general cargo and passenger terminals • Tobin Memorial Bridge • Hanscom Field •
Boston Fish Pier • Commonwealth Pier (site of the World Trade Center Boston) • Worcester Regional Airport

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display is critical if the full potential for the ASDE-X to reduce incursions and increase safety are to be realized.

For the purpose of significantly enhancing airfield safety at the nation's airports, the Authority submits this letter in support of RM-11503, amending your current regulations, to permit manufacturers to produce 1090 MHz squitters for installation in airfield ground vehicles and to allow those devices to operate using the 1090 MHz frequency in an airport environment.

Thank you for accepting our comments on this very important airfield safety enhancement opportunity.

Sincerely,

A handwritten signature in black ink, appearing to read 'David Ishihara', with a horizontal line extending to the right.

David Ishihara
Director, Aviation Operations
Boston-Logan International Airport

Cc: Amy Corbett (FAA)
Vincent Capezzuto (FAA)
Ed Freni (Massport)
Flaviò Leo (Massport)