

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Amendment of Part 1 of the Commission's)	
Rules, Concerning Practice and Procedure,)	MD Docket No. 10-234
Amendment of CORES Registration System)	

**COMMENTS OF
THE BOEING COMPANY**

The Boeing Company (“Boeing”), by its attorneys and pursuant to Section 1.415 of the Commission’s Rules, 47 C.F.R. § 1.415, hereby files its comments on the Notice of Proposed Rulemaking in the above captioned proceeding.¹ Boeing fully supports the Commission’s proposal to assign a single FCC Registration Number (“FRN”) to each entity doing business before the Commission. Such action would promote administrative efficiency, facilitate regulatory compliance, and allow more thorough license research using the Commission’s databases.

The Commission should also allow entities to designate an administrator with primary access to the entity’s FRN and the ability to assign and cancel sub-accounts and control access by authorized users. Further, the Commission should require that entities provide a social security number (“SSN”), taxpayer identification number (“TIN”) or employer identification number (“EIN”) when establishing an FRN and assist administrators by informing them when a person attempts to create a second FRN using the same company name, SSN, TIN or EIN. In that way, administrators can adequately

¹ See *Amendment of Part 1 of the Commission’s Rules, Concerning Practice and Procedure, Amendment of CORES Registration System*, MD Docket No. 10-234, Notice of Proposed Rulemaking, FCC 10-192 (Dec. 7, 2010) (“NPRM”).

police their entity's FRN and control compliance with the Commission's rules and policies.

I. INTRODUCTION AND BACKGROUND

Boeing is responding to the NPRM as the global leader in the design and manufacture of commercial and military aircraft and as a leader in the manufacture and launch of commercial and government satellites. Boeing holds numerous Commission wireless and international licenses, as well as more than one hundred Office of Engineering and Technology ("OET") experimental licenses. Boeing's licenses allow it to develop and utilize various wireless devices and technologies in the design, manufacture and testing of numerous communications systems, including avionics, ground, maritime and aerospace systems.

According to a search of the Commission Registration System ("CORES") database, there are currently twenty-three FRNs held by Boeing, Boeing-affiliated entities, or non-affiliated entities that use the Boeing name in their title. Boeing has numerous divisions, employs more than 158,000 people in the United States, and is currently planning to hire additional staff to support increased aircraft production. Therefore, adequate control over the creation and maintenance of Commission FRNs is exceedingly difficult.

As part of its license management efforts, Boeing conducts searches of the various Commission databases for potential interferers or coordination partners in geographic areas where Boeing has operations. Boeing also conducts such searches as a part of its strategic merger and acquisition process to ensure compliance with the Commission's transfer of control rules prior to completing a transaction. Boeing has

experienced difficulties with this process and has suffered operational delays caused by the use by many entities of multiple FRNs and contact persons.

II. BOEING SUPPORTS THE COMMISSION'S PROPOSAL TO PERMIT ENTITIES TO HOLD ONLY ONE FRN

Boeing supports the Commission's proposal to require that entities use a single FRN to do business with the Commission.² A single FRN will promote administrative efficiency both for the Commission and for entities, such as Boeing, that do substantial business with the Commission. In addition, requiring that entities hold a single FRN would allow license searches in the Universal Licensing System ("ULS") and other Commission databases to be more thorough and reliable.³ It is currently difficult to know with certainty that one has found all of the Commission licenses held by a particular entity because many entities have multiple FRNs.

The Commission should permit entities that currently have multiple FRNs to choose which FRN they would like to keep and should associate all licenses associated with other FRNs for that entity with the primary FRN.⁴ In that way, existing applications and licenses would not need to be modified and no new business could be conducted at the Commission by an entity using any FRN other than the primary FRN chosen.

Further, the Commission should allow an entity to designate a "primary registrant" or FRN administrator with a unique username and password login.⁵ The

² See NPRM, ¶ 15.

³ This efficiency should also carry over to the Commission's new Consolidated Licensing System when it becomes available.

⁴ See NPRM, ¶ 18.

⁵ See *id.*, ¶ 21.

administrator should have the authority to create and delete sub-accounts that are tied to the single FRN.⁶ The sub-accounts could be used by entity employees and contractors, such as consultants or legal counsel, with individual points of contact.⁷ The administrator should have the ability to restrict the access of the sub-accounts so that an employee or contractor with a sub-account could access and work on a single or multiple applications as designated by the administrator. Each sub-account should have a separate username and password so that the administrator would not have to share her username and password with any other employee or contractor.⁸

III. THE COMMISSION SHOULD INFORM FRN ADMINISTRATORS IF A PERSON ATTEMPTS TO CREATE A SECOND FRN

The Commission should assist entities in managing their FRN account by requiring that entities provide a SSN, TIN or EIN to establish an FRN and informing an entity's administrator if any person attempts to create a new FRN using the entity's name, SSN, TIN or EIN. CORES should collect the individual's contact information during the attempted creation of a second FRN and relay that information to the entity administrator. When the person attempts to create the second FRN, the person should be informed that an FRN already exists for that company name, TIN or EIN. CORES should also give the person the name of, and contact information for, the entity's FRN administrator.

In this way, employees and contractors would know who to contact to obtain an FRN sub-account, user name and password. At the same time, the FRN administrator

⁶ *See id.*, ¶ 45.

⁷ *See id.*, ¶ 26.

⁸ *See id.*, ¶ 45.

would be able to contact the individual and ascertain the nature of the business they have for the entity before the Commission, and therefore what access should be granted. Further, the FRN administrator would be able to ensure that the entity's various divisions, affiliates, employees and contractors are acting in compliance with Commission rules and policies.

IV. CONCLUSION

Boeing supports the Commission's proposal to require entities to use only a single FRN to do business with the Commission. Such a requirement would improve administrative efficiency both for the Commission and large Commission-regulated businesses, such as Boeing, with many divisions, employees and contractors. It would also improve searches for Commission licensees and facilitate successful coordination and transfer of control efforts.

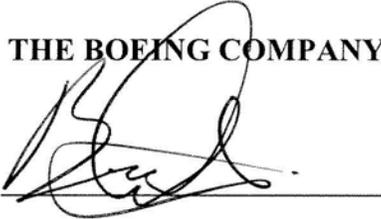
The Commission should also allow entities to designate an FRN administrator with authority to create, delete and control sub-accounts for employees and contractors. Further, in order to facilitate adequate entity control over the FRN and ensure compliance with Commission rules and policies, the Commission should require that entities provide a SSN, TIN or EIN to establish an FRN and inform FRN administrators if a person attempts to create a second FRN using the entity's name, TIN or EIN.

Boeing looks forward to continuing to be an active participant in this proceeding as the Commission moves forward.

Respectfully submitted,

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March 3, 2011