

August 25, 2011

VIA ELECTRONIC FILING

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

Re: Permitted Oral *Ex Parte* Presentation
ET Docket Nos. 06-105 and 10-236

Dear Ms. Dortch:

On August 23, 2011, FCC Chairman Julius Genachowski and his Senior Counsel, Josh Gottheimer, visited Boeing Company facilities in the Puget Sound area, including flight test facilities and a 787 flight test aircraft at Boeing Field in Seattle, Washington, and the aircraft production line in Renton, Washington. Escorting the Chairman at various points during the tour were Audrey Allison, Lou Mancini, Laura Peterson, Dennis O'Donoghue, Keith Wing, Kim Hammonds, Steve Whitlock, Erik Nelson and Jay Culbert, all of Boeing.

During the tour, Boeing representatives explained that Boeing is a heavy user of the Commission's experimental license process to support innovation and testing on new aircraft, other products and technologies. The Boeing representatives expressed support for the overall goals identified in the Commission's currently pending Notice of Proposed Rulemaking ("NPRM") on experimental licensing. The points made during the discussion were consistent with the positions expressed by Boeing in its comments in that proceeding.

The Boeing representatives also expressed concern regarding the increasing imposition of coordination and consent requirements on experimental licenses issued by the Commission's Office of Engineering and Technology ("OET"). Such coordination and consent requirements are often entirely unnecessary because Boeing usually conducts experimental operations in remote locations and at power levels that are insufficient to be detected by, or cause harmful interference to, other authorized spectrum users.

Boeing has also experienced significant difficulty securing consent from some commercial licensees for experimental operations in the regions where they operate. Despite any realistic threat of harmful interference resulting from Boeing's proposed tests, commercial licensees often refrain from cooperating in the coordination process, apparently lacking any incentive to provide their consent to experimental operations. The Boeing representatives therefore urged that the OET impose coordination and consent requirements on experimental licensees only when absolutely necessary to avoid harmful interference.

Please contact the undersigned if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Bruce A. Olcott", is written over a solid horizontal line.

Bruce A. Olcott
Counsel to The Boeing Company