



September 29, 2011

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

**Re: Qualcomm Inc. Petition for Rulemaking to Establish A Next Generation Air-Ground Communications Service, RM-11640**

Dear Ms. Dortch:

Virgin America Inc. ("Virgin America") submits this letter in support of Qualcomm's Petition for Rulemaking to establish a Next-Generation Air-Ground communications service on a secondary licensed basis in the 14.0 to 14.5 GHz band. Virgin America encourages the FCC to move forward quickly with the proposed service so that all airlines can better serve customer demand for internet access while in-flight.

Virgin America was the first airline to offer the Gogo® Inflight Internet service on its entire fleet. As the only airline based in Silicon Valley, our tech-friendly guests have come to expect a fully-connected in-flight experience. For that reason, we recently announced that we will be the first airline to offer enhanced service from Gogo (by the name of ATG-4), which is based on EV-DO Rev. B technology. We believe the next step in delivering the best fully-connected in-flight experience is the next generation air-ground service proposed by Qualcomm. Qualcomm demonstrates the need for such a service in its Petition for Rulemaking.

The mobile broadband revolution has expanded to the aircraft cabin and our guests are increasingly coming on-board Virgin America flights with their smart phones, laptops, tablet computers, and e-readers, and they want to use these devices online while in flight. Virgin America recently partnered with Google to provide Chromebooks at airports for our guests to use while onboard Virgin America aircraft. To support this rapid increase in consumer wireless devices that need always-on connectivity, the FCC should proceed with a rulemaking to address the need for the next generation of air-ground services.

We believe that a grant of Qualcomm's proposal will support the significant growth in mobile broadband demand. For these reasons, we respectfully request that the FCC issue promptly a Notice of Proposed Rulemaking proposing to establish the Next Gen Air-Ground Service at 14.0 to 14.5 GHz using the technology described in Qualcomm's Petition.

Sincerely,

A handwritten signature in blue ink that reads "John J. Varley".

John J. Varley  
Senior Vice President and General Counsel