

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Expanding Access to Broadband and Encouraging Innovation through Establishment of an Air- Ground Mobile Broadband Secondary Service for Passengers Aboard Aircraft in the 14.0-14.5 GHz Band)	GN Docket No. 13-114 RM-11640

COMMENTS OF CTIA – THE WIRELESS ASSOCIATION®

CTIA – The Wireless Association® (“CTIA”)¹ respectfully submits these comments in support of the Commission’s Notice of Proposed Rulemaking (“NPRM”) proposing to increase broadband access onboard aircraft through a new, terrestrial-based air-ground mobile broadband service in the 14.0-14.5 GHz band.² While the Commission must continue to address the spectrum crunch by repurposing additional spectrum below 3 GHz available for terrestrial mobile broadband services as called for in the National Broadband Plan,³ this proceeding will facilitate multi-gigabit broadband connectivity in the in-flight market, enabling passengers to connect to a full range of communications services for business and personal use.

¹ CTIA – The Wireless Association® is the international organization of the wireless communications industry for both wireless carriers and manufacturers. Membership in the organization covers Commercial Mobile Radio Service (“CMRS”) providers and manufacturers, including cellular, Advanced Wireless Service, 700 MHz, broadband PCS, and ESMR, as well as providers and manufacturers of wireless data services and products.

² *Expanding Access to Broadband and Encouraging Innovation through Establishment of an Air-Ground Mobile Broadband Secondary Service for Passengers Aboard Aircraft in the 14.0-14.5 GHz Band*, Notice of Proposed Rulemaking, FCC 13-66, GN Docket No. 13-114, RM-11640 (rel. May 9, 2013) (“NPRM”).

³ *See* Comments of CTIA – The Wireless Association, GN Docket No. 12-354, at 6-12 (Feb. 20, 2013).

DISCUSSION

I. HIGH SPEED WIRELESS SERVICE PROVIDES BUSINESS USERS AND CONSUMERS WITH TREMENDOUS BENEFITS

Mobile broadband has become integral for business and personal use for millions of Americans, whether to communicate with co-workers, clients, or business partners, search for jobs, access news and entertainment, buy and sell services and products, attend class, connect with friends and family, or access health care services. As the Commission recently noted, “wireless broadband represents a critical component of economic growth, job creation and global competitiveness because consumers are increasingly using wireless broadband services to assist them in their everyday lives.”⁴ CTIA has demonstrated the tremendous benefits that mobile broadband delivers across all sectors of the economy, including healthcare, education, transportation, finance, energy and agriculture, among others.⁵ Indeed, more than half of all mobile phones today are smartphones.⁶ Furthermore, there were 22.3 million CMRS-enabled tablets, laptops, and wireless broadband modems by the end of 2012 (up 10.2 percent from 2011) – and this does not even take into consideration those devices that are designed exclusively for

⁴ *Service Rules for Advanced Wireless Services H Block – Implementing Section 6401 of the Middle Class Tax Relief and Job Creation Act of 2012 Related to the 1915-1920 MHz and 1995-2000 MHz Bands*, Report and Order, FCC 13-88, WT Docket No. 12-357, ¶ 2 (rel. June 27, 2013).

⁵ *See, e.g.*, Letter from Christopher Guttman-McCabe, CTIA, to Marlene H. Dortch, Secretary, FCC, GN Docket Nos. 12-268, 09-51, WT Docket No. 11-186 (Jan. 22, 2013) (illustrating the unique ways in which wireless technology is improving the lives of consumers); Letter from Christopher Guttman-McCabe, CTIA, to Marlene H. Dortch, Secretary, FCC, WT Docket No. 11-186 (Sept. 5, 2012) (presenting a paper demonstrating the impact of the wireless broadband industry on the U.S. economy).

⁶ *See* Comments of CTIA – The Wireless Association, WT Docket No. 13-135, at 21 (June 17, 2013).

Wi-Fi connectivity.⁷ Improved in-flight broadband access would help ensure the benefits of mobile broadband service are available to airplane passengers as well.

II. THE PROPOSED AIR-GROUND SERVICE WOULD ALLOW TRAVELERS TO REAP THE BENEFITS OF BROADBAND WHILE IN FLIGHT

Only 4 MHz of spectrum in the 800 MHz band is currently available for air-ground broadband service, which is insufficient to meet the growing consumer demand for, and evolving customer usage of, in-flight mobile broadband service.⁸ Current in-flight broadband options often offer lower speeds than terrestrial broadband services at a higher cost.⁹ The record shows that travelers need and are calling for in-flight broadband service that is on par with the access that is available on the ground.¹⁰ To meet this demand, the number of aircraft offering mobile broadband service is expected to increase from approximately 3,000 aircraft in 2012 to 15,000 aircraft by 2021.¹¹ Although the Commission has taken steps to facilitate the provision of satellite-based in-flight broadband services,¹² it should treat the proposed air-ground mobile broadband service with regulatory parity and let the market decide which systems will succeed.

Improved in-flight broadband access would benefit business and leisure travelers alike.

So called “road warriors” who travel extensively for work are highly dependent on mobile

⁷ See *id.* at 21, 30.

⁸ Comments of Gogo Inc., RM-11640, at 3-4 (Sept. 29, 2011).

⁹ See NPRM, ¶ 16.

¹⁰ See, e.g., Comments of United Airlines, RM-11640, at 1 (Sept. 29, 2011); Comments of Alcatel-Lucent, RM-11640, at 3 (Sept. 29, 2011); Comments of American Airlines, Inc., RM-11640, at 2 (Sept. 29, 2011); Comments of Virgin America Inc., RM-11640, at 1 (Sept. 29, 2011); Comments of Delta Air Lines, Inc., RM-11640, at 2 (Jan. 27, 2012).

¹¹ See NPRM, ¶ 1.

¹² See *Revisions to Parts 2 and 25 of the Commission’s Rules to Govern the Use of Earth Stations Aboard Aircraft Communicating with Fixed-Satellite Service Geostationary-Orbit Space Stations Operating in the 10.95-11.2 GHz, 11.45-11.7 GHz, 11.7-12.2 GHz and 14.0-14.5 GHz Frequency Bands*, Notice of Proposed Rulemaking and Report and Order, 57 FCC Rcd 16510 (2012).

broadband service. Therefore, additional in-flight broadband capability would help this sector of the workforce be more productive and more efficient. Similarly, better in-flight broadband service would provide leisure travelers with more options for communicating with others and accessing news, entertainment and social media. These benefits, in turn, will help support the growth of the national economy and the country's position in the global marketplace. The proposed air-ground service also is consistent with the Commission's interest in working with the Federal Aviation Administration ("FAA") towards allowing greater use of electronic devices on aircraft.¹³

CONCLUSION

Access to mobile broadband services has become an integral component of everyday life and creates significant economic and social benefits for the country and its citizens. Establishing

¹³ Jennifer Martinez, FCC to FAA: Allow "Greater Use" of Electronic Devices During Flights, *The Hill* (Dec. 6, 2012), available at <http://thehill.com/blogs/hillicon-valley/technology/271565-fcc-chairman-to-faa-allow-greater-use-of-electronic-devices-during-flights> (reporting that former FCC Chairman Julius Genachowski urged the FAA to take steps to "enable greater use of tablets, e-readers, and other portable devices" on airplanes and noted that "mobile devices are increasingly interwoven in our daily lives"); see also Comments of CTIA – The Wireless Association, Docket No. FAA–2012–0752 (Oct. 31, 2012).

a new, terrestrial-based air-ground mobile broadband service in the 14.0-14.5 GHz band as proposed by the NPRM would help ensure those benefits extend to air travelers.

Respectfully submitted,

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