



HARRIS CORPORATION

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Via Electronic Filing

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

Re: Ex Parte Notice, GN Docket No. 13-5

Dear Ms. Dortch:

Pursuant to 47 C.F.R. § 1.1200, et seq., Harris Corporation (Harris) hereby notifies the Federal Communications Commission (Commission) of the following ex parte communication in the above-referenced proceeding.

On September 18, 2013, David AmRhein and Patrick Sullivan, on behalf of Harris, and Maureen Cedro and Emily Campbell of the Federal Aviation Administration (FAA), Thomas Duncan of IT Strategy, and Alfred Lee and Tim Sloan of the National Telecommunications and Information Administration (NTIA) (collectively, the participants), met with Rebekah Goodheart, Wireline Legal Advisor to Acting Chairwoman Mignon Clyburn, Sean Lev and Stephanie Weiner of the Office of General Counsel, Genaro Fullano, Jerome Stanshine, and Allan Manuel of the Public Safety and Homeland Security Bureau, Tim Stelzig of the Wireless Communications Bureau, Walter Johnston of the Office of Engineering Technology, and Henning Schulzrinne of the Office of Strategic Planning & Policy Analysis. The discussion centered on the above-referenced docket.

Mr. AmRhein detailed Harris Corporation's role as the Prime Systems Integrator for the FAA Telecommunications Infrastructure (FTI) Program, which is the primary means through which the FAA acquires the telecommunications services required for the National Airspace System (NAS). He discussed the technical dynamics that have led to the fact that over 92% of the NAS' FTI services continue to be TDM-based. For these reasons, the participants urged the Commission to ensure that, in the event it proceeds with IP transition planning and trials:

- 1) The FAA's FTI program does not lose any service functionality as a result of the trial.
- 2) Providers participating in the transition trials offer full disclosure of the differences between the FAA's existing wireline services and planned replacement services.
- 3) No trial activity will eliminate FTI services unless it is conclusively demonstrated that all service functionalities and required characteristics necessary for FTI operations will be preserved during the trial and after the transition to a new technology.
- 4) Each federal entity that is dependent on TDM services will be involved in the trial selection process to avoid service impacts on critical services and to minimize any cost impacts prior to the start of any trials.

Additionally, participants discussed the FAA's plans for modernizing its communications interfaces, and appreciated the need for time and funding to make this possible. Harris asked that the Commission

remain mindful, when participants enter into the detailed planning stage of conducting the actual trials, of the potential impacts to the U.S. air traffic control system when the conduct of the trials enters the detailed planning stage, and recognized a course of action to continue working directly with service providers on how their service offerings may evolve over time. This will ensure the FAA has a clear picture of what communications interfaces will continue to be supported and which communications interfaces will need to be modernized sooner rather than later.

Respectfully submitted,

/s/

Patrick Sullivan
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CC:

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