



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 December 2, 2013, Mark Graham, David AmRhein, and Patrick Sullivan, on behalf of Harris, and Maureen Cedro, William Syptak, and Emily Campbell of the Federal Aviation Administration (FAA), Alfred Lee and Tim Sloan of the National Telecommunications and Information Administration (NTIA), and Thomas Duncan of ITstrategy (collectively, the participants) met with Jon Sallet of the Technology Transitions Policy Task Force, Stephanie Weiner of the Office of General Counsel, Jonathan Chambers and Henning Schulzrinne of the Office of Strategic Planning & Policy Analysis, and Tim Stelzig of the Wireline Communications Bureau. The discussion centered on the above-referenced docket and the attached presentation.

Mr. Graham provided a technical briefing on the FAA National Airspace System (NAS) architecture and the FAA Telecommunications Infrastructure (FTI) program. He made clear that, while efforts are being made through the FAA's "NextGen" programs to upgrade the NAS to communications interfaces based upon Internet Protocol (IP) standards, the vast majority of FTI services continue to be TDM-based. He stated that, as no methods currently exist that are capable of replacing TDM-centric services with compatible IP-based and digital services, Harris expects that support for TDM technologies will be required beyond 2020. Mr. Graham noted that there are funding and scheduling issues that impact the FAA's ability to upgrade to IP interfaces that would be suitable for the NAS. Moreover, Mr. Graham explained, many mission critical NAS applications have stringent timing and latency requirements that are not met by IP-based services.

Mr. Graham urged the Commission to ensure that there is no interruption to FTI services during the IP transition or IP Transition Trials. However, he made clear that Harris does not oppose IP Transition Trials per se, and understands the Commission's desire to initiate a diverse set of experiments to evaluate impact of the eventual loss of TDM services. He suggested that the Commission consider working with the FAA and Harris on IP transition evaluations at FAA testing locations in Atlantic City and/or Oklahoma City. Finally, Mr. Graham requested that the Commission ensure that participating carriers collaborate with the FAA to identify services that could be impacted at serving wire centers participating in any IP Transition Trials and provide suitable technical solutions.

Respectfully submitted,

 /s/

Patrick Sullivan
Government Relations
Harris Corporation

CC:

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Henning Schulzrinne
Tim Stelzig