

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

In the Matter of)	
)	
Expanding Access to Mobile Wireless Services)	WT Docket No. 13-301
Onboard Aircraft)	

COMMENTS OF SOUTHWEST AIRLINES CO.

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Southwest Airlines Co. (“Southwest Airlines”) submits these comments in response to the Commission’s Notice of Proposed Rulemaking regarding expanding access to mobile wireless services onboard aircraft.¹ Southwest Airlines is now America's largest low-fare carrier, serving more Customers domestically than any other airline with a unique combination of low fares with no annoying fees, friendly Customer Service delivered by outstanding People, safe and reliable operations, and an extraordinary corporate Culture that extends into the communities we serve.

Southwest Airlines appreciates the opportunity to provide input and looks forward to working with the Commission as it continues to coordinate its actions in this proceeding with other agencies, including the U.S. Department of Transportation (“DOT”) and the Federal Aviation Administration, that have overlapping responsibilities in this area to achieve a consistent approach and unified parameters for moving forward.

While Southwest Airlines supports efforts to move forward with data wireless mobile, we have serious concerns with new standards enabling inflight voice communications without taking into account: (1) strong public opposition to onboard cell phone calls; (2) the security and safety implications of onboard mobile wireless communications;² and (3) the impact of onboard voice calls on airline cabin crewmembers, who will be responsible for ensuring in-flight compliance with applicable regulations and company policy. Due to these concerns, in addition to the recent actions by DOT and Congress towards banning in-flight cellular phone calls by passengers,

¹ See *Expanding Access to Mobile Wireless Services Onboard Aircraft*, WT Docket No. 13-301, 28 FCC Rcd 17132 (rel. Dec. 13, 2013).

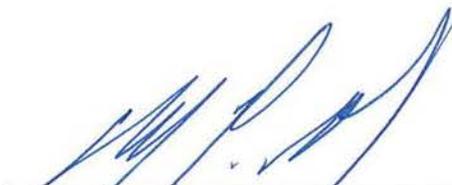
² In 2005, when the FCC considered a similar rulemaking, the Department of Homeland Security, the Department of Justice, and the Federal Bureau of Investigation petitioned the FCC to withdraw its proposal due to security concerns. The current NPRM does not address those concerns and it does not appear that the FCC has engaged in consultations with federal law enforcement.

Southwest Airlines urges the Commission to move forward with its efforts to enable greater data mobile wireless applications, but suspend its rulemaking with regards to voice communications. Until these concerns are addressed and until the U.S. Government develops a consistent policy with regards to in-flight voice communications, Southwest Airlines believes the FCC's actions regarding in-flight calls are premature.

In any event, particularly considering that the vast majority of our Customers, as well as the vast majority of our Employees, do not want voice communications in flight, Southwest Airlines reiterates our position that we have no intent to allow cell phone usage for voice communications in flight.

Finally, Southwest Airlines hereby confirms its support for and adopts by reference the comments being filed by our trade association, Airlines for America

Southwest Airlines looks forward to continuing to work with the Commission as it addresses the important issues raised in this proceeding.



Mark R. Shaw
*Vice President and General Counsel
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