



AIR LINE PILOTS ASSOCIATION INTERNATIONAL

THE WORLD'S LARGEST PILOTS UNION • WWW.ALPA.ORG

535 Herndon Parkway • PO Box 1169 • Herndon, VA 20172-1169 • 703-689-2270 • 888-FLY-ALPA

May 15, 2014

Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Comments Submitted Electronically

Subject: WT Docket No., 13-301, Expanding Access to Mobile Wireless Services Onboard Aircraft

Dear Sir/Madam:

The Air Line Pilots Association, International (ALPA), representing more than 51,000 airline pilots flying for 32 airlines in the United States and Canada, appreciates the opportunity to comment on the Federal Communications Commission's (FCC's) Notice of Proposed Rulemaking (NPRM) to adopt new rules governing mobile communications services aboard airborne aircraft. These rule changes would give airlines, subject to applicable Federal Aviation Administration (FAA) and Department of Transportation (DOT) rules, the choice of whether to enable mobile communications services using an Airborne Access System and, if so, which specific services to enable.

In comments to a separate but related rulemaking, on May 23, 2005 we opposed a similar FCC proposed rulemaking¹ concerning the use of cell phones aboard aircraft. While technology now exists that, if installed, may help to ensure that cellular technology will not adversely affect the navigation and communication avionic components on the aircraft, safety and security concerns for allowing the use of this technology to transmit on or from the aircraft while in flight remain unchanged.

ALPA agrees with the comments submitted by the Association of Flight Attendants-CWA, AFL-CIO (AFA) during the initial comment period,² and provides the following supporting remarks concerning inflight safety and security:

- The overall safety of an entire flight, both on the ground and in flight, is primary. The use of cell phones by passengers may have a negative operational safety impact on the ability of flight attendants to perform their required duties. Passenger use of cell phones for

¹ ALPA comments to WT Docket Number: 04-435, FCC 04-288; Amendment of the Commission's Rules to Facilitate the Use of Cellular Telephones and other Wireless Devices Aboard Airborne Aircraft, dated May 23, 2005.

² C. Witkowski, Comments of the Association of Flight Attendants-CWA, AFL-CIO, February 14, 2014.
<http://apps.fcc.gov/ecfs/document/view?id=7521073351>

conversations during flight could result in flight attendants being required to have adversarial interactions with passengers to resolve avoidable arguments and/or disputes. The overall cabin atmosphere may more frequently deteriorate to unacceptable levels, perhaps even to the point of adversely affecting and even jeopardizing the safety of all occupants. The flight crew's involvement may also be required if a diversion is necessitated due to unruly passenger behavior.

Security of flight is also essential and ALPA is involved with various efforts to maintain and enhance aviation security. Inflight use of mobile broadband technology could be exploited by terrorists to harm aviation security, negating any of the technology's benefits to law enforcement. We do not believe this public docket is the proper forum to discuss specifics of our concerns, but we would be pleased to discuss them privately.

During review of the FCC website, we noted that three of the agency's five commissioners—Pai, Rosenworcel, and O'Rielly— provided dissenting opinions with this rulemaking that are consistent with our own concerns

In conclusion, ALPA opposes the proposed rulemaking and urges the FCC to withdraw it. Doing so will maintain the current ban on the use of cellular technology while inflight and help protect safety and security.

Please do not hesitate to contact me at sean.cassidy@alpa.org or ALPA Senior Staff Engineer Rick Kessel (703/689-4202, rick.kessel@alpa.org), if there are any questions or comments about our position on this matter.

Thank you for providing ALPA the opportunity to comment on this important NPRM.

Sincerely,

A handwritten signature in black ink that reads "Sean P. Cassidy". The signature is written in a cursive style with a large, stylized "S" at the beginning.

Captain Sean Cassidy
First Vice President and
National Safety Coordinator

cc: Veda Shook, AFA-CWA

SC:rk