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July 9, 2014

VIA ELECTRONIC FILING

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

Re: Notice of *Ex Parte* Communication in *Expanding Access to Mobile Wireless Services Onboard Aircraft*, WT Docket No. 13-301

Dear Ms. Dortch:

AeroMobile Communications Limited ("AeroMobile") respectfully submits this notice of *ex parte* communication in the record of the above-captioned proceeding to facilitate the introduction of in-flight mobile connectivity ("IMC") using airborne access systems ("AASs"). On July 8, 2014, Kevin Rogers, CEO of AeroMobile, Ann-Marie Mullan, Head of Legal and Regulatory for AeroMobile, Jessica Elder of LMI Advisors, regulatory consultant to AeroMobile, and the undersigned counsel to AeroMobile met with Louis Peraertz, Legal Advisor, Wireless, International, and Public Safety to Commissioner Clyburn.

AeroMobile presented the points in the attached document and underscored that the Commission may facilitate the operation of AASs onboard foreign-registered airlines that already offer IMC to their passengers while allowing interested parties to develop recommendations for the provision of IMC on U.S. domestic airlines.

Please do not hesitate to contact me with any questions regarding the foregoing.

Sincerely,

Carlos M. Nalda

Enclosure
cc: Louis Peraertz

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AeroMobile Communication Limited
July 8, 2014

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

I. In-Flight Mobile Connectivity Proceeding

- Notice of Proposed Rulemaking
  - Proposes to allow in-flight mobile connectivity using airborne access systems
  - Proposes Part 87 licensing as a new service and requests comment on other approaches, including unlicensed/licensed by rule
  - Requests comments on applicability to foreign aircraft operating in U.S. airspace
- AeroMobile and Other Supporting Comments
  - The FCC should expeditiously enable operations on international flights even if additional requirements may be appropriate for U.S. domestic flights
  - Existing international standards provide a basis for the FCC to enable in-flight mobile connectivity on flights to and from the United States
  - Recognition of foreign aircraft licensing is consistent with principles embodied in relevant international agreements and FCC authority
  - Part 15 provisions or license by rule, potentially supplemented by Part 87 aircraft station licensing, may support operations on international flights of U.S. airlines

II. Public Interest Benefits of In-Flight Mobile Connectivity

- In-flight mobile connectivity provides significant public benefits, including:
  - Enhances competition/consumer choice for connectivity onboard aircraft
  - Extends the reach of wireless carriers to customers within the aircraft cabin
  - Improves the interference environment for U.S. wireless carriers
  - Enhances the passenger experience without adversely impacting safety/security
- Involvement of wireless carrier ensures FCC regulatory policy concerns are satisfied
- Furthers FCC interests in expanding mobile broadband and efficient use of spectrum

III. In-Flight Mobile Connectivity -- A Path Forward

- Adopt policies/rules to enable in-flight mobile connectivity on international flights
  - Recognize foreign aircraft licenses under existing international standards consistent with principles embodied in ITU Convention and ICAO Convention
  - Policy issues fully addressed by foreign airlines that have enabled the offering
  - Adopt Part 15 or license by rule provisions for international flights of U.S. airlines (also applicable to foreign airlines in U.S. airspace)
  - Provides a “test bed” for in-flight mobile connectivity in the United States
- Consider additional U.S. domestic rules in a further stage of this proceeding, if necessary
  - Allows industry and the Commission to further consider U.S.-specific issues
  - Enables U.S. domestic commercial implementations that may differ from current satellite-based, international roaming implementations
  - Ensures the Commission may fully consider technical and regulatory issues, supplemented by information gained from international operations
  - Respects foreign aircraft licensing and supports U.S. airlines operating abroad