



AEROSPACE AND FLIGHT TEST RADIO COORDINATING COUNCIL
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September 22, 2014

Ms. Marlene S. Dortch
Secretary
Federal Communications Commission
445 12th Street S.W.
Room 2-B450
Washington, D.C. 20554

Re: RM-11731
File No. 0006417143

Dear Ms. Dortch:

By Public Notice dated August 21, 2014, the Commission invited comment on a Petition filed by AT&T. The Petition seeks initiation of a rulemaking looking toward changes in Part 27 of the Commission's Rules so as to facilitate AT&T's introduction of an air-ground communications service for airline passengers. The Petition was accompanied by an application intended to implement the proposed service.

Aerospace and Flight Test Radio Coordinating Council, Inc. ("AFTRCC") has had an opportunity to review the proposal, and is pleased to submit these initial comments.

As AFTRCC understands it, AT&T plans use of the band 2345-2350 MHz for uplink transmission from the ground to aircraft (the D Block), and 2315-2320 MHz for downlink transmission from aircraft to the ground (the C Block). Based on these factors and its understanding of other parameters (e.g. eNodeB antenna up-tilt), AFTRCC is of the view that a coordination process will be required to avoid harmful interference to aeronautical mobile telemetry ("AMT") facilities.

At present, based on a preliminary analysis, it is contemplated that protection would be required for any AMT ground station to be located within 10 kilometers of an eNodeB. Protection of AMT ground stations from downlink transmissions from aircraft could require a protection zone having a maximum vertical distance of 5600 feet, and a maximum horizontal distance of 12.6 km.

With respect to mobile AMT facilities, AT&T awareness of the customary locations for mobile AMT facilities, based on information provided by AFTRCC from its database, can help minimize deployment of eNodeBs near locations typically used for such facilities. Likewise, AFTRCC awareness of eNodeB sites based on information provided by AT&T will help AMT

avoid proximity to eNodeB locations in those instances where the AMT site may not have been previously notified to AT&T.

AFTRCC is engaged in discussions with AT&T regarding the proposal. AFTRCC looks forward to a productive outcome to these discussions.

Respectfully submitted,

A handwritten signature in cursive script that reads "Dan Hankins". To the right of the signature, there is a small handwritten mark that appears to be "SD".

Dan Hankins
President