

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)
)
Public Notice Inviting Comment on)
Preliminary Views for the 2007 World)
Radiocommunication Conference)

To: The Commission

**COMMENTS OF AEROSPACE AND FLIGHT
TEST RADIO COORDINATING COUNCIL AND GENERAL
AVIATION MANUFACTURERS ASSOCIATION**

Aerospace and Flight Test Radio Coordinating Council (“AFTRCC”) and General Aviation Manufacturers Association (“GAMA”) (collectively, the “Aviation Parties”) hereby submit this comment in response to the Commission’s Public Notice of June 14, 2004 (DA 04-1698).

The Public Notice invites comment on the recommendations forwarded to the Commission by its World Radiocommunication Conference Advisory Committee (“WAC”). It states that, based upon their “initial review...the International Bureau in coordination with other Commission Bureaus and offices tentatively concludes that we can generally support most of the preliminary views recommended by the WRC-07 Advisory Committee,” but that “the preliminary views related in WAC/015 and WAC/026...are premature or inconsistent with current Commission policies.”

WAC/026 is the preliminary view on WRC-07 Agenda Item 1.5. It calls for consideration of “spectrum requirements and possible additional spectrum allocations for

aeronautical telecommand and high bit-rate aeronautical telemetry.” The preliminary view states, “The United States supports additional spectrum allocations for aeronautical telemetry. Once the ITU-R completes its studies, the United States can make a recommendation regarding the methods by which the agenda item can be best satisfied.”

The Aviation Parties wish to express their concern regarding the position expressed in the Public Notice. The preliminary view says no more than what official U.S. government policy has embraced for nearly two years; namely, that additional spectrum is required for aeronautical telemetry. The U.S. formally supported consideration of this Agenda Item at WRC-03 -- indeed, the U.S. championed the effort which led to placement of the item on the agenda for WRC-07. Thus, the preliminary view is fully consistent with the U.S. Government position, and as such is not premature.

The Aviation Parties are hopeful, however, that a resolution of the differences between the FCC Public Notice and the WAC Preliminary View can be bridged. They look forward to continuing to work with the Commission not only in fashioning a preliminary view which is both acceptable to the agency and respectful of the considerations referenced above, but also in a mutual, long-term effort toward success for the United States on this Agenda Item.

Accordingly, for the foregoing reasons, the Aviation Parties urge the Commission to reconsider the view expressed regarding WAC/026.

Respectfully submitted,

**AEROSPACE AND FLIGHT TEST
RADIO COORDINATING COUNCIL**

**GENERAL AVIATION
MANUFACTURERS ASSOCIATION**

By: /s/ Darryl J. Holtmeyer
Its Vice-Chairman

By /s/ Edward M. Bolen
Its President and CEO

P.O. Box 200547
Cartersville, GA 30120

1400 K Street, N.W., Suite 801
Washington, D. C. 20005

Of Counsel:

William K. Keane, Esq.
Duane Morris LLP
Suite 700
1667 K Street NW
Washington, D.C. 20006-1608

June 29, 2004

WSH\114764.1