



U.S. Department
of Transportation
**Federal Aviation
Administration**

SEP 30 2019

Mr. Peter A. Tenhula
Chairman
Inter department Radio Advisory Committee
1401 Constitution Ave., NW
Washington, DC 20230

Dear Mr. Tenhula:

The Federal Aviation Administration (FAA) has reviewed the Federal Communications Commission (FCC) Order and Notice of Proposed Rulemaking (NPRM), Expanding Flexible Use of the 3.7 to 4.2 GHz Band, GN Docket No. 18-122. The FAA has the following comments that we would like the National Telecommunications and Information Administration (NTIA) file with the FCC for the record.

The FAA wants to ensure that the aviation systems that operate in the upper adjacent band 4.2-4.4 GHz will be protected from harmful interference. The specific systems of concern are radar altimeters and wireless avionics intra-communications (WAIC). Altimeters are a safety system used for landings and ground proximity warnings. WAIC is used for safety communications within commercial aircraft. With regards to the rulemaking, altimeters are the long pole in the tent.

The FAA has been involved with bench tests of altimeters to develop protection standards. These tests are also being used to help determine the compatibility between new services in the band 3.7-4.2 GHz and aviation services in the adjacent band. The Aerospace Vehicle Systems Institute (AVSI) in collaboration with aviation stakeholders is conducting the tests at Texas A & M on altimeters of various manufacturers and different flight scenarios. The tests started about 18 months ago.

The FCC should take into account the results of AVSI tests results before making a final decision on the rulemaking. The FCC must ensure that the altimeters do not receive harmful interference. We believe that the tests being performed by AVSI will help determine if additional measure are necessary to protect altimeters. The FAA requests that the FCC not make a final decision on rulemaking with regards to the band 3.7-4.2 GHz until the results of the AVSI results are available and any interference mitigations have been considered.

Please contact me if you have any questions at 202-267-3700 or michael.richmond@faa.gov

Regards,

A handwritten signature in cursive script that reads "Michael Richmond". The signature is fluid and written in black ink.

Michael Richmond
FAA IRAC Representative