

From: Keith Trundle
To: Doug Young
Date: March 23, 2005
Subject:
Request for Info - File # 0070-EX-PL-2005

Message:

In response to the FCC's questions about license requirements.

Request for Info - File # 0070-EX-PL-2005 [Reference Number: 3531]

1. Please further explain your program of experimentation in regards to not being able to license this elsewhere in the FCC's rules.
2. Are all the transmitters Inmarsat terminals? If so, again, can this be licensed elsewhere in the FCC rules?
3. Provide a detailed justification for a five-year license. Standard licenses are for two years; five years needs to be justified.

Confirmation Number: EL782350
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Response:

1. Please further explain your program of experimentation in regards to not being able to license this elsewhere in the FCC's rules.

We test all consumer electronic devices prior to installation. Verifying compatibility to the Inmarsat terminal during the design phase is critical as we do not have operational aircraft at our disposal.

Changing the aircraft configuration is not possible as the FAA rules about aircraft modification must track maintenance. We cannot just try these devices out and justify it as maintenance.

In addition we use these systems to train customer and company technicians. With restrictions to aircraft that are not available day to day or week to week, a test setup is critical for our commitment to customers.

Originally in 2000 there were no other provisions for operating equipment intended for use on airborne platforms in a fixed location.

Operation of the aircraft falls within the FAA and FCC rules of using the aircrafts registration within the United States. For operations outside the US aircraft operators are still required to have an FCC radio station permit.

In reference to other applications using the same or similar Inmarsat terminals there was my original license and renewals call sign WB2XIJ with file numbers 0078-EX-PL-2000 and 0039-EX-PL-2002

The current licenses for Telenor Satellite Inc., call sign WC2XRT file number 0092-EX-RR-2003 expires 08/01/2005 and WC2XNE file number 0143-EX-RR-2004 expires 12/01/2006

The Boeing Company also has a current license call sign KM2XDY file number 0045-EX-RR-2004 expires 06/01/2006

2. Are all the transmitters Inmarsat terminals? If so, again, can this be licensed elsewhere in the FCC rules?

Yes, these are all Inmarsat terminals. As far as I know when the equipment is installed on an aircraft it's covered by the FAA registration when operating in the US. IF the operator plans to operate outside the US, he must obtain an aircraft radio station permit to operate any of aircraft radio systems.

3. Provide a detailed justification for a five-year license. Standard licenses are for two years; five years needs to be justified.

My original license was for 2 years and the renewal again was for 2 years. When I was calling trying to find out about having another renewal to my expired license I was told I would have to re apply and the experimental licenses could be obtained for up to seven years. I requested five years as the technology we are using today may need to be updated before seven years and little change is expected in the next five years.

Keith Trundle
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