



**Captain Joe Burns**  
Managing Director  
Technology and Flight Test

December 29, 2011

**FILED ELECTRONICALLY**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street, NW  
Washington, DC 20554

Re: **Written Ex Parte Presentation**  
**Application for Authority to Provide Aeronautical Mobile-Satellite (Route)**  
**Service Over the IRIDIUM System, File Nos. SAT-MOD-19961204-00139, SAT-**  
**AMD-20051118-00236 and SAT-AMD-20051118-00236**

Dear Ms. Dortch,

United Continental Holdings, Inc.<sup>1</sup> (“United”), d.b.a. United Airlines, writes this letter to urge the Commission to allow Iridium to provide Aeronautical Mobile Satellite (Route) Service (“AMS(R)S”). AMS(R)S is an aeronautical mobile-satellite service reserved for communications relating to safety and regularity of flights, primarily along national and international civil air routes.

United operates an average of 5,717 flights a day to 376 airports on six continents from its hubs in Chicago, Cleveland, Denver, Guam, Houston, Los Angeles, New York/Newark Liberty, San Francisco, Tokyo and Washington, D.C. United and Continental are both members of Star Alliance, which offers more than 21,200 daily flights to 1,185 airports in 185 countries.

United has had discussions with Iridium concerning the use of Iridium’s global Mobile Satellite Service system for AMS(R)S purposes and has equipped approximately 10 Boeing 737s and over 40 Boeing 757s with Iridium equipment capable of being used for AMS(R)S communications. Additionally, funding is complete and installations of AMS(R)S sets have begun on the entire Boeing 747-400 fleet of 25 aircraft. Pending the outcome of the FCC decision, we are also considering the installation of Iridium on 74 of our Boeing 777 aircraft. International standards are substantially complete and provide a basis for the Commission to proceed with the authorization of AMS(R)S for Iridium’s system. United urges the Commission to enable Iridium to provide AMS(R)S service.

United flies to numerous worldwide destinations and is the most prevalent user of Polar routes – with over 11,500 crossings to-date. In many cases, Iridium is the only satellite network able to provide

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<sup>1</sup> United Continental Holdings, Inc. is the holding company for both United Airlines and Continental Airlines.

communications for the entire flight. The system has complete coverage of the earth, including oceans, airways and Polar Regions. Making Iridium's system available for AMS(R)S purposes will enhance flight safety by giving United access to Iridium's unparalleled coverage.

AMS(R)S over Iridium's unique global network would provide myriad benefits to United by allowing us to enhance our flight safety and communications systems and further secure the safety of its passengers and crew. For these reasons, United respectfully requests that the Commission extend AMS(R)S eligibility to Iridium as soon as possible.

Sincerely,

Joe Burns s/n

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