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February 11, 2009

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

Re: *Ex Parte* Notice – Application of Row 44, Inc. (File Nos. SES-LIC-20080508-00570, SES-AMD-20080619-00826; SES-AMD-20080819-01074; SES-AMD-20080829-01117 ; SES-AMD-20090115-00041; and SES-STA-20080711-00928)

Dear Ms. Dortch:

On behalf of Southwest Airlines Co. (“Southwest”), I spoke by phone on February 10, 2009 with John Giusti, Acting Chief of the International Bureau, to inform him that Southwest has begun testing a new in-flight satellite broadband service in the Ku band in conjunction with Hughes Network Systems, LLC (“Hughes”) and Row 44, Inc. (“Row 44”). This testing is being conducted pursuant to a grant of modified experimental authority issued to a Hughes subsidiary on February 5, 2009 by the Commission’s Office of Engineering and Technology. *See* File No. 0013-EX-ML-2009. Southwest has equipped one aircraft with this aircraft-to-satellite technology, and it is set to equip three additional aircraft by early March 2009. All passengers participating in this testing will be informed that, at this time, this in-flight satellite broadband service is being provided for experimental purposes only and that this service can be cancelled at any time. Following my conversation with Mr. Giusti, I e-mailed him a copy of Southwest’s press release regarding this testing. A copy of Southwest’s press release is also attached to this letter.

In our conversation, I also urged that the Bureau expeditiously grant Row 44’s pending application to operate Aeronautical Mobile-Satellite Service transmit/receive Earth terminals aboard commercial and private aircraft. Following a grant of this application, Southwest plans to use Row 44’s technology to provide Southwest’s Customers with real-time, in-flight access to the Internet at download speeds comparable to home or office broadband connections. With this high-quality, high-speed broadband service, Southwest passengers, using their own laptops and handheld devices, will have access to a new realm of in-flight information and entertainment. Southwest Customers will be able to communicate with family and friends, make arrangements in their destination cities, and conduct business – all without disturbing other passengers. This planned broadband offering is part of Southwest’s fundamental commitment to providing the best possible service to its customers.

Ms. Marlene Dortch  
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This letter and the attached press release are being filed for inclusion in the public record of this proceeding.

Sincerely,

/s/ Regina M. Keeney  
Regina M. Keeney

cc: John Giusti



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## **SOUTHWEST AIRLINES TESTS THE INFORMATION SUPERSKYWAY**

### ***Airline Begins Customer Tests of InFlight Wi-Fi***

**DALLAS**—Feb. 10, 2009—Peanuts, pretzels, internet? That's the question for some Southwest Airlines Customers today as the airline tests wi-fi. Southwest is the first to test new aircraft to satellite technology on commercial aircraft. Southwest Airlines, in conjunction with Row 44, has equipped one aircraft with the technology and is set to equip three additional aircraft by early March 2009. Southwest is also partnering with Yahoo! to offer an in-flight homepage with destination-relevant content. Southwest will be testing the technology for the next few months. To view a photo of the wi-fi equipped aircraft visit <http://gallery.swamedia.com/photos/value=open/type=jpg>. To view a blog post, video, or listen to podcast visit [www.blogsouthwest.com](http://www.blogsouthwest.com).

"Internet connectivity has been high on our list of priorities for quite some time," said Dave Ridley, Southwest Airlines Senior Vice President of Marketing and Revenue Management. "We believe the aircraft-to-satellite technology is the most robust solution in the industry, and we look forward to the feedback from our Customers."

"Southwest is all about creating the best travel experience for their Customers," said John Guidon, Row 44 Chief Executive Officer. "We couldn't be prouder that they've selected Row 44's high-speed broadband to enhance their Customers' experience yet again with Internet connectivity inflight."

When Southwest Customers board the wi-fi enabled aircraft, they will be greeted with wi-fi placards and onboard instruction sheets. Those interested in using the service during the test period will have the opportunity to log on to the service free of charge via their own personal wi-fi enabled device (laptops, iPhones, wi-fi enabled smart phones, etc). Cellular technology will not work with the wi-fi service. The service is being offered on a trial basis, and has not yet received final FCC approval.

Southwest Airlines is also teaming with Yahoo! to offer an in-flight homepage that includes a one-of-a-kind flight tracker, as well as daily programming of local news and information. The new flight tracker will allow passengers to follow the plane's flight path, and

—more—

## **2/Wi-fi**

view “fly-over” points of interest along the route, with images from Flickr. The Yahoo!/Southwest homepage will be maintained by Yahoo!, and will include destination-relevant content such as local events, weather and news, as well as destination guides that highlight top restaurants, attractions and shopping. Also featured are a number of Yahoo! Games, perfect for wiling away the hours.

“For years, Yahoo! has given its users a 30,000 foot view of what’s happening in the world, and it’s exciting to have an opportunity to do so from 30,000 feet,” said Joanne Bradford, senior vice president of revenue and market development, Yahoo! “The Yahoo!-Southwest homepage will give passengers the information they need about what’s happening on the ground, before they land, so they can literally make on-the-fly decisions about their trip.”

After 37 years of service, Southwest Airlines, the nation’s leading low-fare carrier, continues to differentiate itself from other airlines—offering a reliable product with exemplary Customer Service. At Southwest Airlines, fees don’t fly. Customers can check their first two bags for free (size and weight limits apply), there are no change fees, no fees for a window or aisle seat, and, as always, snacks, sodas, and smiles are all complimentary!

Southwest Airlines is the most productive airline in the sky and offers Customers a comfortable traveling experience. Southwest offers a very comfortable ride with all premium leather seats and plenty of legroom with a young all Boeing 737 fleet. Southwest Airlines (NYSE: LUV), the nation's largest carrier in terms of domestic passengers enplaned, currently serves 64 cities (with service to Minneapolis/St. Paul starting in March 2009) in 32 states. Based in Dallas, Southwest currently operates more than 3,200 flights a day and has more than 35,000 Employees systemwide.

[www.southwest.com](http://www.southwest.com)

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