

LAWLER, METZGER, KEENEY & LOGAN, LLC

2001 K STREET, NW
SUITE 802
WASHINGTON, D.C. 20006

REGINA M. KEENEY

PHONE (202) 777-7700
FACSIMILE (202) 777-7763

July 1, 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 Tuesday, June 30, 2009, Karen Lewis of Southwest Airlines Co. (“Southwest”), Ginny Carruthers of Alaska Airlines, Inc. (“Alaska Airlines”), Steve Berman of Lawler, Metzger, Keeney & Logan, LLC, and I met with Robert Nelson, Karl Kensinger, Stephen Duall, William Bell, and Kathryn Medley of the International Bureau’s Satellite Division. At this meeting, we urged the FCC to move promptly to grant Row 44, Inc.’s (“Row 44’s”) above-captioned request for a permanent license to provide Aeronautical Mobile Satellite Service (“AMSS”) in the United States. Southwest, the nation’s largest airline, and Alaska Airlines, the leading west coast carrier, have been providing Row 44’s satellite-based in-flight broadband service on a small number of planes on a temporary basis, and these airlines are eager to make broadband service available to all of their passengers.

As representatives of Southwest and Alaska Airlines described at the meeting, the expeditious grant of Row 44’s application for a permanent license will generate enormous benefits, including substantial work for almost a dozen technology companies all over the United States at a critical time in our economy. In addition, as discussed at the meeting, competing airlines are moving forward with their own in-flight broadband services, and Southwest and Alaska Airlines need to move forward promptly with their own in-flight broadband offerings. Passengers on Southwest and Alaska Airlines flights also will benefit greatly from real-time, in-flight broadband access at download speeds similar to home or office broadband connections. With high-quality, high-speed broadband service, passengers, using their own laptops and handheld devices, will have access to a new realm of in-flight information and entertainment.

Ms. Marlene Dortch
July 1, 2009
Page 2

At the meeting, we also addressed the fact that no interference issues stand in the way of a grant of Row 44's application for a permanent license. Row 44's May 11, 2009 test report demonstrates that its satellite broadband system can operate without causing interference to other satellite services. ViaSat, a competing satellite provider that has been unable to gain a contract with any of the major airlines, has been doing everything it can to slow down or stop approval of Row 44's system, but the Commission should not reward these anti-competitive efforts by further delaying a grant of Row 44's application. Significantly, none of the three satellite operators potentially affected by Row 44's operations – Intelsat, SES Americom, and EchoStar – are concerned about interference or oppose Row 44's application for permanent authority.

The lone opponent to Row 44's application has presented no legitimate basis for further delay. Rapid action by the Commission will set into motion the benefits for the economy, passengers, and the airlines described above. Accordingly, Southwest and Alaska Airlines urge that the Commission should move expeditiously to a grant of this application.

Pursuant to section 1.1206(b)(2) of the Commission's rules, 47 C.F.R. § 1.1206(b)(2), this letter is being filed for inclusion in the public record of the above-captioned proceedings.

Sincerely,

/s/ Regina M. Keeney
Regina M. Keeney

cc: Robert Nelson
Karl Kensinger
Stephen Duall
William Bell
Kathryn Medley