

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the Matter of)
)
Thales Avionics, Inc.)
700 S. Babcock Street)
Melbourne, FL 32901 USA)
)
Applications for Blanket License to)
Operate Earth Stations Aboard Aircraft)

File Nos. SES-LIC-20170217-00183
SES-AMD-20170414-00381

Call Sign: E170068

REPLY TO OPPOSITION OF IRIDIUM CONSTELLATION LLC

I. INTRODUCTION AND SUMMARY

Thales Avionics, Inc. (“Thales”), pursuant to Section 25.154(c) of the Commission’s rules,¹ hereby replies to the petition to deny filed by Iridium Constellation LLC (“Iridium”)², in response to Thales’s above-referenced applications. Thales’s applications request a blanket license to operate earth stations aboard aircraft (ESAA) that would communicate with certain geostationary satellite orbit (“GSO”) Fixed-Satellite Service (“FSS”) space stations.

II. DISCUSSION

Iridium’s petition to deny encompasses 50 MHz between the 29.25 - 29.3 GHz band, which is reserved for MSS feeder links and for communications between GSO FSS space stations and earth stations in fixed locations and the band plan makes no provision for GSO FSS communications with

¹ 47 C.F.R. § 25.154.

² Petition to Deny of Iridium, File Nos. SES-LIC-20170217-00183 and SES-AMD-20170414-00381, (filed 05/26/2017), “Petition to Deny”.

earth stations in motion.³ Thales understands that the 29.25 - 29.3 GHz band is used by Iridium for its feeder links. Accordingly, Thales has requested coordination with Iridium for this 50 MHz of spectrum. Until Thales and Iridium are able to reach a coordination agreement, Thales requests that the Commission defer action on this portion of its applications and move forward with grant of the use of the 18.3 – 19.3, 18.638 – 18.763, 19.7 – 20.2, 28.438 – 28.563, 29.3 – 30.0 and 29.5 – 30.0 GHz bands for Thales high-speed in-flight connectivity (IFC) services.

III. PUBLIC INTEREST BENEFITS

Grant of this application will serve the public interest. Thales is a global leader in providing leading-edge in-flight entertainment (IFE) and high-speed IFC services to commercial Airlines, their passengers, and crews. Thales's IFC services will provide Airlines with new opportunities to meet passengers' increasing demands for reliable, robust, high-speed IFC while also providing Airlines with access to critical, real-time data streams from inflight aircraft to help improve operational efficiencies. Notably, grant of the requested applications will serve the public interest by allowing Thales to meet broadband needs of US Airline passengers and offer services such as IFE and In-flight wireless and internet connectivity for passengers' Wi-Fi enabled personal electronic devices including laptop computers, tablets and smartphones, VPN client access and mobile applications.⁴

IV. CONCLUSION

Based on the foregoing, Thales requests the Commission to grant immediately its application, Call Sign E170068, for use of the bands 18.3 – 19.3, 18.638 – 18.763, 19.7 – 20.2, 28.438 – 28.563, 29.3 – 30.0 and 29.5 – 30.0 GHz and defer action on the 29.25 - 29.3 GHz band until Thales and Iridium finalize a coordination agreement. Grant of these applications will advance the Commission's

³ See Iridium opposition at ¶ 9

⁴ See Federal Communications Commission, *Connecting America: The National Broadband Plan* (2010) at 16-18.

broadband goals, is in the public interest, by allowing users to benefit directly from the applications and content they access through high-speed in-flight networks.

Respectfully submitted,

June 2, 2017

Thales Avionics, Inc.
700 S. Babcock Street
Melbourne, FL 32901 USA

By: /s/ _____
Pat Amodio
Senior Director - Regulatory Compliance

CERTIFICATE OF SERVICE

I, David Katko, do hereby certify that on this 2nd day of June, 2017, I served a true copy of the foregoing by first class mail upon the following:

Maureen C. McLaughlin
Vice President Public Policy
Iridium Constellation LLC
1750 Tysons Boulevard
Suite 1400
McLean, VA 22102

/s/ _____
David Katko