



SOUTHWEST AIRLINES CO.

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Federal Communications Commission
Office of the Secretary

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Application of Row 44, Inc. (File No. SES-LIC-20080508-00570)

Dear Ms. Dortch:

Southwest Airlines Co. ("Southwest") submits this letter in support of the application of Row 44, Inc. ("Row 44") to operate Aeronautical-Mobile Satellite Service ("AMSS") transmit/receive Earth terminals aboard commercial and private aircraft. See Public Notice, Report No. SES-01036 (released May 28, 2008). Row 44's service would give passengers and airline crews real-time, in-flight access to the Internet at download speeds comparable to home or office broadband connections.

Southwest carries more passengers than any other airline in the world. Southwest places a very strong emphasis on customer service and implementation of Row 44's service will allow Southwest to better serve its passengers by offering state-of-the-art Internet services.

Accordingly, grant of Row 44's application will allow Southwest to provide in-flight Internet services to its passengers in the near-term. Row 44's service will allow travelers to use their own personal laptops and handheld devices to connect to the Internet, offering them a new realm of in-flight information and entertainment. Travelers will have the ability to conduct business operations mid-flight, as they will be able to communicate with colleagues and receive vital news and information, updating their knowledge and presentation materials in advance of important business meetings. Passengers will be able to make or change hotel and dinner reservations in advance of their arrival. In addition, air travelers will have a previously unavailable means to communicate with friends and family during flight, allowing them to relay important flight information to loved ones -- without disturbing other passengers.

If Row 44's application is approved, Southwest will be able to meet the increasing consumer demand for broadband access during flights. Expedient approval of Row 44's application will benefit not only Southwest, but the traveling public as well.

Best Regards,


Gary Kelly