

In regard to:

Amendment of Part 22 of the Commission's Rules to Benefit the Consumers of Air-Ground Telecommunications Services, WT Docket No. 03-103

Continental Airlines, Inc. would like to offer the following comments regarding the Federal Communications Commission's reexamination of the rules governing the provision of air-ground telecommunications services on commercial aircraft.

Continental Airlines has utilized air-ground voice & data services in the 800 MHz band for many years, and continues to do so today. Although the demand for

voice services has declined over the past few years, the demand for data services continues to increase.

We estimate that the airline customer's desire for in-flight connectivity services such as internet access, email and text messaging will only continue to

strengthen moving forward. Additionally, as the proliferation of ground-based broadband services such as DSL, cable modems and public wi-fi hotspots

continues, there is a direct correlation with the increase in consumer data rate expectations for the onboard environment.

Continental Airlines recommends the Commission:

1) Retain the 4 MHz spectrum in the 800 MHz band for commercial air-ground services.

2) Consider the competitive landscape in the 800 MHz band in the broad scope of in-flight passenger data connectivity and not the more narrowly defined

aspect of a stand-alone service.

3) Not divide the 4 MHz spectrum into slices and allocate those

units to separate service providers, so that no service provider would have the

necessary bandwidth to meet the broadband expectations of the consumer.

4) Allow service providers the flexibility to change their services and offerings within the spectrum (i.e. voice services versus data services), based

on customer demand as the demand for these various services may vary over time. Dictating the type of services within the spectrum would only limit the

service providers' abilities to adjust their offerings to best meet the consumers' needs.

Continental Airlines appreciates the opportunity to comment on this issue.

Sincerely,

James Compton

Executive Vice President - Marketing

Continental Airlines, Inc.

Mark Moran

Executive Vice President - Operations

Continental Airlines, Inc.

Original letter sent via USPS.

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03-103</p>

<p class=MsoNormal><DATE>
09/29/2004</p>

<p class=MsoNormal><NAME>
James Compton and Mark Moran</p>

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<p class=MsoNormal><TEXT>In

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Moran</span></font></p>

<p class=MsoNormal><font size=2 face=Tahoma><span style='font-size:10.0pt'>Executive  
Vice President - Operations</span></font></p>

<p class=MsoNormal><font size=2 face=Tahoma><span style='font-size:10.0pt'>Continental  
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