FRONTIER

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September 23, 2004

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

RE: WT Docket No. 03-103
Ex Parte Comments

Dear Ms. Dortch:

Frontier Airlines is aware that the Federal Communications Commission ("FCC") is planning to restructure its rules in the 800 MHz Air-Ground Radiotelephone Band.

Frontier enthusiastically endorses this project, and urges the FCC to proceed as rapidly as possible. There are a number of interesting technological applications which we believe will benefit consumers that are awaiting development pending the FCC's decisions.

Frontier also hopes that the Commission will carefully examine the question of whether it is technically feasible for multiple broadband providers to occupy the band. Assuming the FCC reaches the conclusion that this can be done, there is no doubt that airlines and consumers would best be served by allowing competition between multiple vendors. Competition will control consumer prices, foster the development of new capabilities, and encourage rapid implementation of new service offerings by (airline) and others.

Sincerely,

Jeff S. Potter
President and CEO

R. L. CRANDALL
5215 N. O'Connor Blvd., Suite 1775
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September 27, 2004

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Honorable Michael K. Powell
Chairman
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Dear Mr. Chairman:

I've been very fortunate to spend over 30 years in the airline industry, including 25 years at American Airlines, where I served as President, Chairman and CEO in the years prior to my retirement in 1998. Late last year I was honored to be appointed by U.S. Secretary of Transportation Norman Mineta to serve on the FAA's Management Advisory Council, a group of individuals selected to council the agency on management, policy, spending and regulatory matters. Over a period of many years, I have been active in the Air Transport Association and in a multitude of aviation related roles.

I am aware that the Federal Communications Commission is planning to restructure its rules in the 800 MHz Air-Ground Radiotelephone Band. I enthusiastically support this effort, because having sufficient bandwidth available for broadband communications will facilitate the introduction of new technologies which will benefit both airlines and their customers.

Through my activities on Air Cell's Board of Directors, I know that the company has done extensive analysis and testing and has concluded that it is possible to allow more than one broadband provider to safely and effectively occupy the band.

If the Commission concurs with this conclusion, I hope it will structure its new rules in such a way that multiple companies will have an opportunity to participate in developing and marketing those technologies. Competition will provide airlines a choice among providers and services, will accelerate the development and deployment of new capabilities, and will lower the cost of services for consumers.

Sincerely,

Robert L. Crandall

RLC:eh

NORTHWEST AIRLINES

Andrew C. Roberts
Senior Vice President
Technical Operations

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September 28, 2004

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

RE: WT Docket No. 03-103
Ex Parte Comments

Dear Ms. Dortch:

Northwest Airlines is aware that the Federal Communications Commission (FCC) is planning to restructure its rules in the 800 MHz Air-Ground Radiotelephone Band.

Northwest Airlines enthusiastically endorses this project, and urges the FCC to proceed as rapidly as possible. There are a number of interesting technological applications which (airline believes will benefit consumers that are awaiting development pending the FCC's decisions.

Northwest Airlines also hopes that the Commission will carefully examine the question of whether it is technically feasible for multiple broadband providers to occupy the band. Assuming the FCC reaches the conclusion that this can be done, there is no doubt that airlines and consumers would best be served by allowing competition between multiple vendors. Competition will control consumer prices, foster the development of new capabilities, and encourage rapid implementation of new service offerings by (airline) and others.

Sincerely,

Andrew C. Roberts

cc: Jim Griffin

TOTAL P.02

Joseph B. Leonard
Chairman and Chief Executive Officer

September 23, 2004

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

RE: WT Docket No. 03-103
Ex Parte Comments

Dear Ms. Dortch:

AirTran Airways is aware that the Federal Communications Commission (FCC) is planning to restructure its rules in the 800 MHz Air-Ground Radiotelephone Band.

AirTran Airways enthusiastically endorses this project, and urges the FCC to proceed as rapidly as possible. There are a number of interesting technological applications which AirTran Airways believes will benefit consumers that are awaiting development pending the FCC's decisions.

AirTran Airways also hopes that the Commission will carefully examine the question of whether it is technically feasible for multiple broadband providers to occupy the band. Assuming the FCC reaches the conclusion that this can be done, there is no doubt that airlines and consumers would best be served by allowing competition between multiple vendors. Competition will control consumer prices, foster the development of new capabilities, and encourage rapid implementation of new service offerings by AirTran Airways and others.

Sincerely,

Joseph B. Leonard

August 30, 2004

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W., Room TW-A325
Washington, DC 20554

In the Matter of

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

American Airlines offers the following comments regarding the Federal Communications Commission's reexamination of the rules governing the provision of air-ground telecommunications services on commercial aircraft.

American Airlines utilized air-ground voice services in the 800 Mhz band for many years. Due to changes in passenger demand, fueled to a large degree by the proliferation of cellular telephones, the demand for voice services dropped off dramatically. This led American Airlines to suspend passenger voice services.

While the demand for passenger voice services has waned, the demand for data services continues to increase at a dramatic pace. Airline passengers increasingly desire to have data connectivity in flight for services such as email, text messaging, and internet access.

Not only does the demand for data services continue to grow, consumer's expectations of data rates continues to grow in lockstep with what consumers experience in the office and at home though T1, DSL and Cable services.

American 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 not in context of the 800 MHz air-ground services band as a stand-alone service, but consider the competitive landscape in the broader scope of in flight passenger data connectivity. Data services in the 800 Mhz air-ground band have the potential to offer competitive alternatives to other technologies such as satellite data services.

3) Not split up the 4 Mhz spectrum and allocate slices of the spectrum to separate service providers, such that none of the service providers have the bandwidth necessary to meet the current and future broadband expectations of the consumer.

4) Not dictate what type of services the spectrum is used for, i.e. voice services versus data services versus cell phone back haul versus email, etc. Passenger demand for various services will change over time, and service providers must have the flexibility to change their service offerings to meet the passenger, the consumer demand. It is expected however that these services will be based on the transport of digital data.

Regards,

Rich Farr
Sr. Manager, Radio Communications
American Airlines