



AIR TRANSPORT ASSOCIATION

JAMES L. CASEY
VICE PRESIDENT-INDUSTRY SERVICES
& DEPUTY GENERAL COUNSEL
+1.202.626.4211
jcasey@airlines.org

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Ofcom
Riverside House
2A Southwark Bridge Road
London SE1 9HA
United Kingdom

Re: Consultation on applying spectrum pricing to the maritime and aeronautical sectors

Dear Sir or Madam:

The Air Transport Association of America (“ATA”) submits this letter in support of the October 24th comments about the above-referenced matter that the International Air Transport Association (“IATA”) submitted. ATA is the trade association that represents the largest U.S. airlines, many of which serve the United Kingdom.¹

IATA’s comments described at length the infirmities of this consultation. We wish to highlight several areas where the proposals suffer from serious shortcomings.

First, and foremost, aeronautical use of the spectrum is inextricably tied to safety considerations. Those considerations, along with operational needs distinct to aviation, are reflected in international standards, which the consultation does not take into account. In particular, it overlooks the standard setting regime of the International Civil Aviation Organization and the aeronautical-related obligations that the United Kingdom has undertaken through its participation in the World Radiocommunication Conference. These longstanding systems provide the authoritative structure in which aeronautical spectrum issues are resolved with worldwide application. In contrast, this consultation implies a unilateral venture into this area, which unmistakably requires global solutions.

¹ ATA’s members are ABX, Inc.; AirTran Airways; Alaska Airlines, Inc.; American Airlines, Inc.; ASTAR Air Cargo, Inc.; Atlas Air, Inc.; Continental Airlines, Inc.; Delta Air Lines, Inc.; Evergreen International Airlines, Inc.; Federal Express Corporation; Hawaiian Airlines; JetBlue Airways Corp.; Midwest Airlines; Northwest Airlines, Inc.; Southwest Airlines Co.; United Airlines, Inc.; UPS Airlines; and US Airways, Inc. ATA’s associate members are Air Canada; Air Jamaica; and Mexicana.



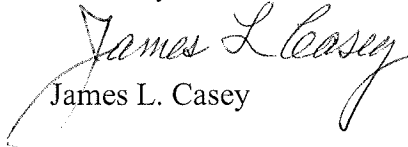
AIR TRANSPORT ASSOCIATION OF AMERICA, INC.

1301 PENNSYLVANIA AVENUE, NW SUITE 1100 WASHINGTON, DC 20004-1707
202.626.4000 www.airlines.org

Moreover, the consultation does not recognize the efficiencies that have been achieved in aeronautical spectrum use. Equally troubling, it does not recognize the voice and data demands that aeronautical operations will generate in the years ahead. While the proposals clearly will generate revenue for the government, we do not see how they will meet predictable communication needs that the future wellbeing of aviation will depend upon.

In light of the nature and extent of the consultation's infirmities, we respectfully request that it be withdrawn.

Sincerely,


James L. Casey