

November 17, 2014

Department of Transportation
Aviation Consumer Protection
1200 New Jersey Ave. SE
Washington, D.C. 20590

Re: Sixth Meeting of the Advisory Committee for Aviation Consumer Protection,
Docket No. DOT-OST-2012-0087

To Whom It May Concern:

The Telecommunications Industry Association (“TIA”) and the Information Technology Industry Council (“ITI”) jointly submit this letter in response to the above referenced meeting.¹ TIA and ITA appreciate the Advisory Committee’s attention to potential consumer protection issues related to the use of mobile wireless devices for voice calls on aircraft.

TIA and ITI are pleased that all speakers on this issue clarified that there are no consumer protection concerns associated with the use of mobile devices onboard aircraft for “quiet” applications (e.g., SMS and data/email), and that the Department of Transportation’s inquiry is limited to the impact of voice calls only. TIA and ITI support the remarks by Kevin Rogers, CEO of AeroMobile, regarding in-flight use of mobile devices onboard foreign airlines. Among other things, Mr. Rogers presented information establishing that many airlines have chosen to disable voice service and, for airlines that choose to offer voice (including airlines flying regularly to and from the United States that serve a large percentage of U.S. passengers), the use of mobile voice applications has had no adverse effects on airline operations or passengers.

Accordingly, the Department need not adopt a ban on in-flight mobile voice onboard U.S. airlines. Rather than an *a priori* ban that limits airline and consumer choice, the Department should permit U.S. airlines to retain the choice of offering applications such as text, mobile data, and voice that they determine best suit their passengers’ needs. The introduction of new in-flight connectivity applications, including in-flight use of mobile devices as an alternative to WiFi-based offerings, will enhance competition in the in-flight connectivity market and the passenger experience onboard aircraft.

Please contact Danielle Coffey (dcoffey@tiaonline.org) or Vince Jesaitis (vjesaitis@itic.org) with any questions regarding this letter.

Sincerely,

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¹ TIA and ITI jointly filed comments in response to the *Advanced Notice of Proposed Rulemaking* regarding the use of mobile wireless devices for voice calls on aircraft. See Joint Comments of the Telecommunications Industry Association and The Information Technology Industry Council, Docket No. DOT-OST-2014-0002, RIN No. 2105-AE30 (Apr. 7, 2014).