



# PUBLIC NOTICE

Federal Communications Commission  
445 12<sup>th</sup> St., S.W.  
Washington, D.C. 20554

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DA 20-659

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## WIRELESS TELECOMMUNICATIONS BUREAU SEEKS COMMENT ON REQUEST FOR WAIVER OF 450 MHZ GENERAL AVIATION AIR-GROUND RADIOTELEPHONE SERVICE RULES TO PERMIT SERVICE TO UNMANNED AIRCRAFT SYSTEMS

WT Docket No. 20-185

**Comment Date: July 24, 2020**

**Reply Comment Date: August 10, 2020**

With this Public Notice, we seek comment on a request that asks the Commission to waive certain General Aviation Air-Ground Radiotelephone Service rules, filed by AURA Network Systems OpCo, LLC and A2G Communications, LLC (collectively, Petitioners).<sup>1</sup> Petitioners seek relief of certain rules that dictate the types of services that may be provided, specify minimum separation between co-channel stations, limit the amount of spectrum assigned in a particular area, and set a minimum power limit for ground and airborne stations. Petitioners argue that waiver is necessary to provide new voice and data applications, including service to unmanned aircraft systems, to the broadest base of aviation subscribers possible.

We seek comment on the issues raised by Petitioners' request for waiver.

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Pursuant to section 1.925(c) of the Commission's rules, 47 CFR § 1.925(c), interested parties are invited to file comments or replies on or before the dates indicated on the first page of this document. All filings must reference WT Docket No. 20-185. Comments may be filed using the Commission's Electronic Comment Filing System (ECFS).

- **Electronic Filers:** Comments may be filed electronically using the internet by accessing the ECFS: <https://www.fcc.gov/ecfs/>.
- **Paper Filers:** Parties who choose to file by paper must file an original and one copy of each filing.

Filings can be sent by commercial courier or by the U.S. Postal Service. All filings must be addressed to the Commission's Secretary, Office of the Secretary, Federal Communications Commission.

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<sup>1</sup> AURA Network Systems OpCo, LLC and A2G Communications, LLC, Request for Waiver, filed June 12, 2020. See, e.g., Call Sign KCC973, ULS File No. 0009112677.

- Commercial deliveries (other than U.S. Postal Service Express Mail and Priority Mail) must be sent to 9050 Junction Drive, Annapolis Junction, MD 20701.
- U.S. Postal Service First-Class, Express, and Priority mail must be addressed to 445 12<sup>th</sup> Street, SW, Washington, DC 20554.
- **Effective March 19, 2020, and until further notice, the Commission no longer accepts any hand or messenger delivered filings. This is a temporary measure taken to help protect the health and safety of individuals, and to mitigate the transmission of COVID-19. See *FCC Announces Closure of FCC Headquarters Open Window and Change in Hand-Delivery Policy*, Public Notice, DA 20-304 (March 19, 2020). <https://www.fcc.gov/document/fcc-closes-headquarters-open-window-and-changes-hand-delivery-policy>**
- **During the time the Commission’s building is closed to the general public and until further notice, if more than one docket or rulemaking number appears in the caption of a proceeding, paper filers need not submit two additional copies for each additional docket or rulemaking number; an original and one copy are sufficient.**

*People with Disabilities:* To request materials in accessible formats for people with disabilities (braille, large print, electronic files, audio format), send an e-mail to [fcc504@fcc.gov](mailto:fcc504@fcc.gov) or call the Consumer & Government Affairs Bureau at 202-418-0530 (voice, 202-418-0432 (tty)).

*Ex Parte Rules.* This proceeding shall be treated as a “permit-but-disclose” proceeding in accordance with the Commission’s *ex parte* rules.<sup>2</sup> Persons making *ex parte* presentations must file a copy of any written presentation or a memorandum summarizing any oral presentation within two business days after the presentation (unless a different deadline applicable to the Sunshine period applies). Persons making oral *ex parte* presentations are reminded that memoranda summarizing the presentation must: (1) list all persons attending or otherwise participating in the meeting at which the *ex parte* presentation was made; and (2) summarize all data presented and arguments made during the presentation. If the presentation consisted in whole or in part of the presentation of data or arguments already reflected in the presenters written comments, memoranda, or other filings in the proceeding, the presenter may provide citations to such data or arguments in his or her prior comments, memoranda, or other filings (specifying the relevant page and/or paragraph numbers where such data or arguments can be found) in lieu of summarizing them in the memorandum. Documents shown or given to Commission staff during *ex parte* meetings are deemed to be written *ex parte* presentations and must be filed consistent with section 1.1206(b) of the Commission’s rules. In proceedings governed by section 1.49(f) of the rules or for which the Commission has made available a method of electronic filing, written *ex parte* presentations and memoranda summarizing oral *ex parte* presentations, and all attachments thereto, must be filed through the electronic comment filing system available for that proceeding, and must be filed in their native format (*e.g.*, .doc, .xml, .ppt, searchable .pdf).<sup>3</sup> Participants in this proceeding should familiarize themselves with the Commission’s *ex parte* rules.

*Additional Information.* For further information regarding this Public Notice, please contact Nina Shafran, Mobility Division, Wireless Telecommunications Bureau, at [Nina.Shafran@FCC.gov](mailto:Nina.Shafran@FCC.gov) or 202-418-2781.

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<sup>2</sup> See 47 CFR § 1.1200 *et seq.*

<sup>3</sup> *Id.* § 1.1206(b).