



Cointrin, 10 April 2014

Directeur Général,
Autorité de régulation des communications électroniques et des postes,
7, square Max Hymans,
75730 Paris Cedex 15, France

ATTENTION: MONSIEUR BENOÎT LOUTREL

Dear Sir,

RE: ARCEP DECISION ON CONDITIONS FOR PROVIDING MOBILE COMMUNICATIONS ON BOARD AIRCRAFT IN FRENCH AIRSPACE

OnAir was incorporated in February 2005 and is owned by SITA, the leading IT solutions provider to the air transport world. Since 2007, OnAir's products have enabled passengers use their own mobile phones, smartphones, tablets and laptops in exactly the same way as they do on the ground, either through the onboard cellular network or the onboard Wi-Fi hotspot. OnAir's products are currently available on 20 Airlines based in Asia, Europe, the Middle-East and Latin America.

OnAir is pleased to take this opportunity to comment on ARCEP's proposed Decision, to repeal its Decisions n ° 2008-1187 and n ° 2008-1188, whilst implementing, at the national level, the framework defined by the European Commission in its Decision No 2013/654/EU of 12 November 2013, thereby establishing conditions for use of radio installations to provide mobile communications services on board of aircraft (MCA).

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OnAir supports EC Decision No 2013/654/EU in so far as that Decision extends the license-exempt nature of the additional connectivity bands to which the Decision refers.

Regarding specific considerations raised by ARCEP's consultation, OnAir's comments are as follows:

1. The CEPT had completed studies concerning the 2.6 GHz band in May 2008 and provided for technical requirements which would become applicable after a grace period ending in January 2017 as is detailed in EC Decision No 2013/654/EU. This said, terrestrial networks have already been deployed in this band within several European countries and there have not been any complaints to date by mobile network operators regarding harmful interference caused by MCA systems. OnAir therefore considers it pertinent to raise the question of whether the technical requirements are justified by a need to avoid harmful interference.
2. In order better to assess the need, OnAir believes that the grace period referred to could be used (at least until the end of 2015) as a period in which National Telecommunication Regulatory Authorities (including ARCEP) could investigate through their respective national mobile network operators, whether any interference has been experienced. In the absence of any such interference, there would appear to be no need to implement interference avoidance considerations at the national level for the 2600 MHz band
3. In the event that it were concluded that further interference avoidance measures should be introduced, then we respectfully draw to ARCEP's attention the fact that with respect to the on-board MCA system, the architecture is very specific as it involves a satellite link between the aircraft and the ground. Unlike ground cellular networks, an additional functional component to the on-board base station, known as Network Control Unit (NCU) is required in order to raise the noise floor within the aircraft and to prevent mobile handsets on-board the aircraft from connecting to ground cellular networks. Specific hardware developments would be required by equipment suppliers. Such



updates will lead to added complexity in the NCU design as well as technical challenges and, will therefore require significant lead time to implement.

Please accept the assurances of our highest consideration.

Yours sincerely,

A handwritten signature in black ink, reading 'Wawrzynkowski', written in a cursive style.

Eric Wawrzynkowski

Technical Officer - Regulatory Affairs

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