



October 30, 2012

Susan J.M. Cabler
Asst. Manager, Aircraft Engineering Division,
Aircraft Certification Service
Federal Aviation Administration
800 Independence Avenue SW
Washington, DC 20591

Timothy W. Shaver
Avionics Maintenance Branch,
Flight Standards Service, AFS-360
Federal Aviation Administration
800 Independence Avenue SW
Washington, DC 20591

Re: Docket No. FAA-2012-0752

Dear Ms. Cabler and Mr. Shaver:

The Voice on the Net (“VON”) Coalition¹ submits these comments opposing an in-flight ban of voice communications using Voice over Internet Protocol (“VoIP”) if portable electronic devices (“PEDs”) are found to be compatible with aircraft systems in the Federal Aviation Administration’s (“FAA”) Notice of Policy and Request for Comments in Docket No. FAA-2012-0752 (the “Notice”). In its Notice, the FAA seeks comments on guidance, procedures, and policy that aircraft operators use when deciding whether to allow passengers to use PEDs at any point during the course of flight while still maintaining passenger and aircraft safety. While the use of all PEDs is prohibited during flight by the FAA, aircraft carriers have established exceptions to these regulations that they have determined do not cause interference to aircraft systems.

The Federal Communications Commission (“FCC”) has already determined that in-flight use of broadband services is safe.² As such, passengers on commercial aircraft will be able to take advantage of the benefits of IP communications services, including VoIP, as more commercial aircraft are equipped with broadband services. Passengers will be able to take advantage of file transfers and text chats with IP communications services. Furthermore, passengers on commercial airlines will be able to communicate with family, friends, and co-workers during their trip.

We oppose any ban or any further restrictions on in-flight communications. There is no evidence showing that in-flight communications are harmful or cause safety concerns. In fact, in-flight voice communication service for passengers has been deployed to 3 continents, 52 nations across Europe, Australia, Asia, and the Middle East going to 240

¹ The Voice on the Net or VON Coalition consists of leading VoIP companies, on the cutting edge of developing and delivering voice innovations over the Internet. The coalition, which includes AT&T, Broadvox, BT, Cloud Communications Alliance, Google, iBasis, Microsoft, Nextiva, Skype, Vonage and Yahoo!, works to advance regulatory policies that enable Americans to take advantage of the full promise and potential of VoIP. The Coalition believes that with the right public policies, Internet based voice advances can make talking more affordable, businesses more productive, jobs more plentiful, the Internet more valuable, and Americans more safe and secure. Since its inception, the VON Coalition has promoted pragmatic policy choices for unleashing VoIP's potential. <http://www.von.org>

² Federal Communications Commission Consumer Advisory. *Using Wireless Devices on Airplanes*, available at <http://transition.fcc.gov/cgb/consumerfacts/cellonplanes.pdf>.



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destinations over 7,000 different routes with generally positive results.³ Additionally, there are many benefits that in-flight VoIP services offer consumers, airlines, and communications providers. Further, a ban on all in-flight communications would put United States at a competitive technological disadvantage to the rest of the world by denying aircraft passengers a service already offered in other countries around the world. The FAA should take whatever steps are necessary to support flexible PED use on aircraft, including IP communications.

We understand that this policy must consider the safety and security concerns of aircraft carriers and passengers. We support the FAA's partnership with the Federal Communications Commission to examine in-flight use of PEDs.

Please contact the undersigned if you have any questions.

Sincerely,

The VON Coalition

Glenn S. Richards
Executive Director

³ Inflight Passenger Communications Coalition, *Hold Up on the Hang Up Act! Section 423 of (H.R. 915) Deprives Airline Passengers of Telecommunications Choices*, available at http://www.passengercommunications.com/legislation_cellphonesonplanes.shtml.)