



AIRCRAFT OWNERS AND PILOTS ASSOCIATION
421 Aviation Way • Frederick, Maryland 21701-4798
Telephone (301) 695-2000 FAX (301) 695-2375

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Federal Communications Commission
Office of the Secretary

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FILE

May 2, 1991

Ms. Donna Searcy
Secretary
Federal Communications Commission
1919 M Street, NW
Washington, DC 20554

93-199 ✓

Reference: Petition of John Furr, et al
Requesting Rulemaking concerning
Standards for Aviation Receivers
FCC Petition No. RM 7610 ✓

Dear Ms. Searcy:

The Aircraft Owners and Pilots Association (AOPA) representing the aviation interests of 300,000 aircraft owners and pilots strongly opposes the petition before the Federal Communications Commission (FCC) submitted by John Furr and Associates, Inc. This request for rulemaking would have significant adverse impacts on the general aviation community by causing the unnecessary obsolescence of thousands of aircraft receivers. The petitioner's complaint focuses on the broadcast industry's attempt to have freedom of choice in site selection for FM broadcast stations without considering the interests of other entities having equal need for airspace access.

The petitioner fails to recognize the aviation industry's process to assure that aircraft receivers are validated through a number of steps. In the United States, the Radio Technical Commission for Aeronautics (RTCA) has established Minimum Operational Performance Standards (MOPS) from which the Federal Aviation Administration (FAA) establishes Technical Standard Orders (TSOs) for on-board avionics. This provides for thorough validation of the equipment carried aboard today's aircraft. Validation that has been coordinated throughout the aviation industry and among the international organizations.

AOPA agrees with National Business Aircraft Association (NBAA) regarding costs that would be associated with the granting of the petition submitted by Furr. Re-equipment of the general aviation fleet having Instrument Landing System (ILS) receivers to the new proposed standard would cost up to \$2 billion. Clearly, this is an unreasonable and unjustified economic burden for the general aviation community to bear and one that is unnecessary in light of the standards on-board ILS units currently meet.



FCC MAIL SECTION

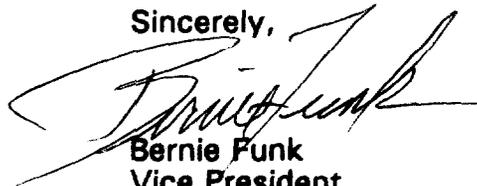
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Mr. Furr's petition should be dismissed since it provides no justification for the proposal and is improperly directed. Further, the Federal Aviation Administration and the Federal Communications Commission are currently working cooperatively to reach a common understanding regarding frequency interference and other spectrum concerns.

AOPA supports the comments submitted by the Air Transport Association, Aeronautical Radio, and the National Business Aircraft Association.

Sincerely,



Bernie Funk
Vice President
Office of Technical Analysis
and Support

cc: Jerry Markey
FAA, DC