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February 20, 1996

Office of the Secretary
Federal Communications Commission
Washington, DC 20554

Re: WT Docket No. 96-1

The following comments are provided on the Notice of Proposed Rule Making (NPRM) proposing to amend the Commission's Aviation Service Rule, 47 C.F.R. Part 87, to eliminate station operator requirements and permit the operation of aeronautical advisory stations (unicoms) in an unattended, automated mode. I am responding to the NPRM as a private citizen with the following qualifications: commercial pilot, flight instructor, aircraft owner.

In general, the concept of using automated, unattended unicom stations that can provide aviation advisory information, weather reports and radio checks will significantly enhance aviation safety. I have utilized the automated station operated by PATC at Potomac Airfield, MD, on many occasions. Even during the highest traffic periods, the Potomac automated unicom provided valuable, safety-related information without disrupting normal voice communication on the unicom frequency. The automated feature was valuable even when the unicom station was manned by an operator. In fact, it seems to reduce congestion on the frequency because airport and weather information can be obtained by clicking the microphone rather than having to make voice requests for the same information. The information provided by the PATC automated unicom at Potomac provides more information than a normal unicom operator provides, but in a very short and concise manner.

I do not concur with the proposed requirement for the unicom to utilize a three second period with no detectable signal to determine that the frequency is not in use. Three seconds of "dead air" does not make sense for advisories that are pilot controlled by clicking the microphone. I suggest that pilots be held responsible for courteous and reasonable operation of the automated unicom, as they are for the aeronautical radio station in their aircraft. since its transmission is controlled by the pilot, if a pilot keys the automated advisory system, it should provide an immediate response. This should help to minimize frequency congestion.

The proposed method of activation, brief keyed RF signals, appears to be compatible with pilot-controlled lighting systems and is a preferred method of operation. I do not concur, however, with the proposal to require a "time stamp" as discussed in paragraph 11 of the NPRM. As an alternative, I propose that the system only provide a "time stamp" for broadcast information that is of a safety of flight nature and is not provided in "real time." For example, the automated system at Potomac Airfield provides wind information that comes from an automated system. This information is very much related to safety of flight and used to make takeoff and landing decisions, including runway in use. It would only be important to the pilot to know if it was not "real time" information. Perhaps the alternatives are that if a failure occurs to the weather reporting system the automated unicom station uses, the unicom station should not broadcast any wind information, shut down completely, or provide a time stamp that the information being broadcast was last

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updated at a specific time. The "time stamp" data in this case would allow the pilot to make a judgment as to the validity of the data. Requiring the time stamp on all transmissions at all times would increase frequency congestion since the transmissions would be necessarily longer .

The proposal to require shutdown after a specific amount of time of continuous transmitter operation is a good idea to prevent inadvertent continuous transmissions. Since the normal weather and airport advisory information provided by an automated station is usually much less than three minutes, detection of malfunction after three minutes might overburden the unicom frequency. I suggest that 2 minutes of continuous operation would allow for adequate advisory information to be broadcast without transmitter shutdown, but would ensure only limited interference on the frequency in case of malfunction.

Requiring a method to limit repetitive broadcasts should not be required. I do not concur with the example suggestion in paragraph 13.d) of limiting repetitive broadcasts to no more than two in a ten minute period. Weather conditions can change very rapidly and since the automated system that I am familiar with broadcasts current weather information, it is imperative that the the advisories not be limited. As stated before, since the advisory is broadcast under pilot control, it is up to the pilot to determine when the advisory is needed and not be handicapped by a time limitation. Adoption of this part of the proposal would serve to defeat one of the very valuable safety features provided by this system.

Limiting the number of automated unicoms at controlled airports to one is a satisfactory proposal. The main aviation benefit of the automated service is providing weather and runway information. Unicom services at controlled fields are generally concerned with providing aircraft servicing and coordination for pilots. Therefore, providing one automated service that provides weather and runway information, especially during hours that the tower is not operating, is satisfactory.

Not included in this proposal is the authorization for an automated station to broadcast station identification information. I suggest that the automated station broadcast, on a periodic basis, the station name and operating instructions. For example, it should broadcast, "Potomac unicom automated advisory. Click 3 times for advisory information, 4 times for radio check." The automated system in this case should monitor the frequency prior to transmission and transmit only when no detectable signals are received for at least 3 seconds.

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