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December 3, 2014

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

RE: WT Docket No. 14-196

Dear Ms. Dortch,

On behalf of over 375,000 pilots and aircraft owners in the United States, the Aircraft Owners and Pilots Association (AOPA) wishes to express our support for the Federal Communications Commission's grant of a waiver to permit certification and use of the Breitling Dual Band Emergency Watch (the "Emergency2"), which includes a Personal Locator Beacon (PLB).

Breitling recently requested a waiver of Section 95.1402 of the Commission's rules that requires that PLBs comply with certain standards maintained by the Radio Technical Commission for maritime Services (RTCM). These standards contemplate a conventional PLB which is generally a handheld, box shaped device and set standards addressing, among others, the controls, battery performance, labeling and physical color. The small size and intended use of the Emergency2 makes compliance with certain RTCM requirements either irrelevant or infeasible. The Commission's Wireless Telecommunications Bureau granted Breitling a waiver in 2001 for a similar wrist worn safety device, called the Emergency.

The Breitling Emergency2 wristwatch is equipped with a dual frequency transmitter that helps with both initiating a search and rescue operation as well as locating survivors. The availability of this type of device along with other technologies provides pilots with numerous options to augment equipment installed in general aviation aircraft. In our opinion there are compelling safety reasons that warrant expeditious granting of Breitling's waiver request. The Emergency2 provides pilots with an option for assisting in location when their aircraft's installed device is damaged or destroyed after the occupants have evacuated the aircraft.

Like the original version of the Breitling Emergency, the new Breitling Emergency2 will have detailed conditions that consumers will have to agree to prior to a purchase. These conditions clarify that "the transmitter cannot be activated, except in clear situations of distress." Consumers are also informed that improper use "...may involve penalties and lead to substantial financial expenses, and in addition the cost of the rescue operations provoked by the signal of the transmitter," thus providing additional financial disincentives against deployment for non-emergency purposes. According to Breitling's request, similar provisions have been in place for the original version of the Breitling Emergency and no false alarms have been reported.

As well, and also according to the request, many European nations have already approved the use of the Breitling Emergency2 and have done so through the application of the aforementioned condition of sales, and no false alarms have been reported to date in Europe.

For these reasons, AOPA supports the Commission's expeditious granting of the Breitling waiver request. Thank you for your consideration.

Regards,

A handwritten signature in black ink, appearing to read 'REH', is centered on a light gray rectangular background.

Robert E. Hackman
Vice President, Regulatory Affairs