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April 19, 2010

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12th Street, SW  
Washington, DC 20554

Re: **RM-11596 (In The Matter Of Establishment of Audio Visual Warning System as New Subpart T to Part 87 of the Commission's Rules and Regulations To Authorize Advanced Audio Visual Warning Systems for Antenna Structures and other Air Navigation Obstacles)**

Dear Ms. Dortch:

Please accept this letter, filed pursuant to Section 1.405 of the Commission's Rules,<sup>1</sup> in support of the Petition for Rulemaking filed by OCAS, Inc. ("Petition") that appeared on Public Notice on March 18, 2010.<sup>2</sup> The Petition<sup>3</sup> seeks to establish a new Subpart T, Audio Visual Warning Systems ("AVWS") under Part 87 of the Commission's Rules to permit owners and operators of antenna structures and other air navigation obstacles to secure authority to operate advanced AVWS stations as an alternative to the "always-on" antenna structure lighting typically deployed at antenna structures and other air navigation hazards.

This letter is written on the behalf of the Helicopter Association International (HAI). HAI is a not-for-profit, professional trade association which represents the interests of the civil helicopter community. HAI has approximately 3,000 members, inclusive of 1,600 member companies in more than 74 nations. Our members fly over 5,500 helicopters approximately 2.5 million flight hours per year. Our primary focus is safety.

Within this focus on safety, obstacle collisions is one of our primary areas of concern. According to the Federal Aviation Administration, wire and obstruction strikes are the top operational cause for

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<sup>1</sup> 47 C.F.R. § 1.405.

<sup>2</sup> *See in re* Establishment of Audio Visual Warning System as New Subpart T to Part 87 of the Commission's Rules and Regulations To Authorize Advanced Audio Visual Warning Systems for Antenna Structures and other Air Navigation Obstacles, *Public Notice*, Report No. 2905, RM No. 11596 (March 18, 2010).

<sup>3</sup> Petition for Rulemaking of OCAS, Inc., RM No. 11596 (filed March 4, 2010)("Petition").

fatal rotorcraft accidents. Over the last decade there has been an average of one aviation obstruction strike every five days in the U.S. Nearly 30 percent of all collisions are fatal and that number nearly doubles when the aircraft is operating in or around instrument meteorological conditions or at night.

HAI views the implementations of Audio Visual Warning Systems (AVWS) as a promising and cost-effective new technology that can significantly improve safety outcomes by warning low flying aircraft of obstacles in their flight path. The additional warning to pilots as offered by the AVWS VHF warning capabilities is an essential component making these types of systems critical in some high risk areas such as river crossings and canyons where wires are virtually invisible to pilots in some weather conditions. These audio warning aspects are the most powerful aspect of the AVWS solutions as it provides a warning to pilots that will draw their full attention to the obstacle, give a description of what to look for and will provide a warning in any type of visibility or weather conditions (unlike the currently FAA prescribed paint and orange marker balls). The fact that AVWS do not require any additional equipment (such as an expensive transponder) on the aircraft makes the solution available to almost all rotorcraft.

HAI fully supports the approval of this Petition for Rulemaking that will allow for the routine use and licensing of AVWS frequencies as the HAI considers this advancement in technology a welcome means of increasing the safety in and around air obstructions with the primary goal of decreasing the number of accidents related to obstruction strikes.

Sincerely,



Matthew Zuccaro  
President, HAI

**CERTIFICATE OF SERVICE**

I certify that on April 19, 2010, a copy of the foregoing Statement in Support of the OCAS, Inc. Petition for Rulemaking was served via electronic mail on the following individuals:

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