



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.

The mission of the National Emergency Medical Services Pilot's Association (NEMSPA) is to serve the pilots involved in the air-medical transport industry, and to work to improve the quality and safety of those services. As airborne EMS operations have seen a drastic increase in fatal accidents, we see it as our duty to investigate valid and proven solutions that address this pervasive problem. We believe AVWS technology is an essential component in addressing the issue of wire and obstruction strikes.

<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").

AVWS systems assist low flying aircraft in the identification of air obstructions, in particular, wire crossings in rivers and valleys and tall towers. The system combines lighting as well as a VHF radio transmission to the aircraft which announces the proximity of the structure. We believe the audio component has a significant positive impact on aviation safety in all flying conditions by providing the effective alerting of an aircraft/pilot that they are on a potentially life threatening course, and to take action. The added benefit is that any aircraft with a VHF radio on board benefits from this technology with no additional equipment required.

In this letter we state our full support for the approval of this life saving technology by allowing for the immediate authorization and routine licensing of the Part 87 frequencies required for the radar and VHF components associated with the Obstacle Collision Avoidance System (OCAS) or FAA termed "AVWS."

Sincerely,

A handwritten signature in black ink, appearing to read 'Kent Johnson', written over a light blue horizontal line.

Kent Johnson, President  
NEMSPA

**CERTIFICATE OF SERVICE**

I certify that on \_\_\_\_\_, 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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