



**DEPARTMENT OF THE AIR FORCE**  
HEADQUARTERS AIR COMBAT COMMAND  
LANGLEY AIR FORCE BASE, VIRGINIA

21 July 2010

MEMORANDUM FOR FEDERAL COMMUNICATIONS COMMISSION

FROM: ACC/A8SR

SUBJECT: COMMENTS ON NTIA AND FAA FILING 01-289

1. The Search and Rescue Enterprise Branch, of the Systems Support Division of the Air Combat Command Requirements Directorate, has reviewed the Third Report and Order in WT Docket No. 01-289, in the Matter of Review of Part 87 of the Commission's Rules Concerning the Aviation Radio Service, which the Federal Communications Commission (FCC) adopted on June 1, 2010 and released on June 15, 2010. We do not agree with the Federal Aviation Administration's (FAA) position that the Third Report and Order that would amend Section 87.195 of Title 47, Code of Federal Regulations to prohibit "the manufacture, importation, or sale or use of 121.5 MHz emergency locator transmitters (ELTs)" is detrimental to the aviation community.
2. One of our concerns is that the FAA, which conducted a cost benefit analysis associated with the termination of satellite monitoring of 121.5MHz ELTs for the years 1990-2005, never included any costs borne by the Air Force, Coast Guard, and other search and rescue (SAR) services in the conduct of SAR operations associated with general aviation aircraft, as well as the value of lives saved from those operations. It is our position that if the analysis included the cost associated with these SAR operations and include the value of lives saved, then the value of the transition to 406 MHz ELTs would far exceed the cost. The National Search and Rescue Committee, the federal-level committee formed to coordinate civil search and rescue matters of interagency interest within the United States, asked the FAA to include these costs in their analysis, but our request was declined.
3. We fully support the transition away from 121.5 MHz ELTs as soon possible but understand the issues associated with ensuring there is enough supply to meet with anticipated demand. We feel it would have been more appropriate to ban the installation of 121.5 MHz ELTs on any new aircraft and the production and sale of new 121.5 MHz ELTs immediately, but to allow a grace period of two to three years for replacement of the old beacons in GA aircraft. This way, as old 121.5 MHz ELTs become unserviceable, it would necessitate incurring the cost of replacement with a 406 MHz ELT but allows a reasonable transition period. There is already precedent in the maritime community with the 121.5 MHz Emergency Positioning Indicating Radio Beacon (EPIRB) ban.
4. 121.5 MHz ELTs are truly out dated technology and it is not in the best interest of the aviation community or that of the Search and Rescue services to allow their continued manufacture and installation.

A handwritten signature in black ink, appearing to read "Allan C. Knox", with a long horizontal flourish extending to the right.

ALLAN C. KNOX, GS-13, DAFC  
Chief, Search and Rescue Enterprise