The proposed rule on ELT certification and use affects me, and I believe I am one of the smallest of the "small organizations" affected; I am an individual aircraft owner whose plane has a 121.5MHz only ELT.

The proposal specifically asks for grandfathering information, and I would like to address that issue. If existing installations are not grandfathered, I would be forced to purchase a new 406 ELT plus a certified GPS to go with it (roughly $2000 together) plus pay for rewiring and installation (at least 10 hours of labor). For that price, I obtain nearly zero benefit.

I fly mostly in the Northeast US, where I am under constant radar surveillance today, and, living within 20nm of Boston, I will be under the ADS-B requirement in a few years. My location is already quite well known, and will be better still in the future even without a new ELT.

In terms of help after a crash, that $3000 or more for a new ELT would be spent on survival kits or new seat belts / restraint system. In terms of overall safety, the money would be much better spent on ADS-B equipment, or an approach-certified GPS, or a TIS-B traffic display, or an AOA indicator, or an oxygen system, or even a fuel totalizer. Those things help prevent crashes in the first place.

At best, the 406 ELT requirement helps put me in compliance with foreign airspace requirements. Given that non-rescue aircraft will not be directly monitoring 406MHz, and (free!) VHF monitoring of 121.5MHz by most operators will likely continue for many years to come, I would like to retain the option of determining for myself when or if ELT replacement suits my needs.

Further, I believe that the best interests of the aviation community are served if this specific ELT question is delegated to the FAA, as the FAA is already tasked with determining costs to operators for the ADS-B requirements and other safety and compliance issues.