

## **FCC NPRM to Ban 121.5 ELTs (2<sup>nd</sup> Attempt)**

On January 30, The FCC published another attempt to ban use of 121.5 MHz ELTs and require all existing aircraft to replace 121.5 ELTs with 406 MHz ELTs. <https://federalregister.gov/a/2013-01871>

AOPA has estimated cost to industry to be in excess of \$500M.

<http://www.aopa.org/advocacy/articles/2013/130228fcc-floats-new-elt-ban-proposal.html>

**As an active Mission Pilot for the Civil Air Patrol (CAP) and active general aviation (GA) pilot, I can personally attest that while 121.5 MHz may no longer be formally monitored by satellite, it is actively monitored by airliners and GA aircraft. I have personally identified and found several active 121.5 ELTs in the past 12 months.**

**Banning use of 121.5 MHz ELTs is not a matter of spectrum use or RF interference. It is simply a bureaucratic step to force universal adoption of 406 MHz ELTs. The FAA and not the FCC should be the main determining agency for migration to 406 MHz. I do not know of any study or statistic quantifying improved safety using 406 MHz ELTs vs. 121.5 ELTs.**

**As a general aviation aircraft owner, I see no safety benefit to install a 406 Mhz ELT in favor of my currently installed 121.5 Mhz ELT. In fact, I only see a > \$1,000 cost for a new 406 MHz ELT and recurring recertification costs in the future.**

**BOTTOM LINE: Forcing migration from 121.5 MHz to 406 MHz ELT only adds more cost and provides no appreciable benefit.**

Sincerely,  
Alexander Craig  
CAP Major and Mission Pilot

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