

FCC - I recommend disapproval of FCC 13-2 because for final terminal location of a crashed aircraft most non-satellite crash location systems still use 121.5 MHz technology. Although 406 MHz technology is compatible with satellite receivers, some 406MHz ELTs also transmit on 121.5 so that a crashed aircraft may be terminally located in forest, mountainous or other types of terrain which limits rescuers visibility of a crashed aircraft. In fact pilots consider ELTs that do not transmit on 121.5 a deficiency since 406 does not provide terminal location in visibility limited terrain. Another factor is the a pilot will transmit on 121.5 MHz in an emergency situation & other aircraft will attempt to locate an aircraft in distress. Civilian GA aircraft do not have 406 MHz frequency coverage. Finally, inadequate ELTs suppliers exist to support immediate civilian upgrades to 406 MHz ELTs especially due to the FAA AD on ELTs with velcro mounting which includes some 406 ELTs.

The proposed ELTs will not free up FCC frequency spectrum since it is already used by FAA airspace & military.

Again, recommend that FCC resend FCC 13-2 for the above cited reasons.