

COMMENTS TO FCC PROPOSAL WT DOCKET NO. 01-289, FCC 13-2

I strongly oppose the subject proposal, which in effect would force pilots to switch to 406 MHz ELTs, thereby in my opinion hindering, rather than improving, aviation safety.

I own a very simple, inexpensive aircraft (a Cessna 140) equipped with a brand-new 121.5 MHz ELT. The only reason my aircraft is equipped with an ELT is that the Congress forced the FAA to write that requirement into the Federal Aviation Regulations. I consider it an unnecessary governmental intrusion into my rights—an example of government trying to protect me from myself.

My flying is all done VFR-day within about 50 miles of my home airport, but more typically within about 10 miles. The fact that 121.5 MHz ELTs are no longer monitored by satellite is not of concern to me; airlines and ground observers still provide that monitoring, which I consider adequate.

If your proposal is made law, I will be forced to scrap my new ELT and spend another \$1000 to \$2000 getting a 406 MHz ELT installed. Spending that amount, very unnecessarily in my view, limits my scarce resources to keep my airplane safe through effective maintenance on items that really matter. I would much rather spend that money on the new ADS-B equipment that is being mandated and will be a big improvement in navigational, weather, and traffic information—something that will truly have a positive effect on aviation safety (something the subject proposal lacks). Incidentally, by its capability of providing the last known position and registration number of an ADS-B equipped aircraft, it will render ELTs superfluous.

Also, mandating FAA TSO'd 406 MHz ELTs freezes the technology at its current level because of the high cost of FAA certification. The technical capabilities of other commercially available equipment such as emergency position indicating radio beacons (EPIRBs), personal locator beacons, cell phones with GPS tracking, and commercial tracking devices is constantly being improved and can provide the same or better tracking than 406 MHz ELTs—all at much lower cost! I believe that aircraft owner and pilots should be allowed to decide what technology works best in the particular cases of their flight operations.

Lastly, I believe aviation safety should be the sole province of the FAA, which should remain the sole authority for regulations affecting aviation, and that the FCC should defer on issues of aviation safety rather than impose an unnecessary regulatory burden.

Sincerely,

G. Michael Huffman