

WT Docket No. 01-289, FCC 13-2

The Federal Communication Commission's plan to prohibit the certification, manufacture, importation, sale, or use of 121.5 MHz ELTs—effectively forcing pilots to switch to 406 MHz ELTs—would hinder, not improve, aviation safety and conflicts with existing laws. Additionally, there has been no study or analysis provided showing increased safety benefits.

I recommend that the FCC defer to the FAA on this issue and scrap the plan to force the removal of 121.5 ELTs from aircraft.

Prohibiting the use of 121.5 ELT use also affects the 406 ELTs since they also broadcast on 121.5 MHz. Additionally, 121.5 MHz is also universally used as an emergency voice frequency in the United States.

Because neither 121.5 nor 406 ELTs are 100-percent reliable, industry has been developing alternative rescue devices which many pilots are adapting. By 2020 ADS-B will all but make ELTs obsolete. At a cost of several thousand dollars to convert to a 406 MHz ELT, the expense is unwarranted given the remaining useful life of ELTs and would stifle continued development of less expensive alternatives.