

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

Comments on FCC proposal to eliminate 121.5 MHz ELT.

In my opinion, the FCC is not qualified to issue regulations directly affecting the safety of the flying public and should defer to the FAA in this matter. As a prime example, the total lack of coordination with the FAA on the publishing of the earlier rule demonstrates to me that the expertise does not exist in the FCC. The FAA considers more than just the frequency use aspect and issues TSO's for equipment manufacturers to follow in order for an ELT to be installed in a certified aircraft. These include requirements for activation as well as other non frequency related issues. The FAA also provides guidance on how these ELT units are to be mounted including the routing of the antenna cables and antenna. The installation of an ELT was the result of an infamous aviation accident that involved the disappearance of a congressman. More recently an ex senator from Alaska was killed in an accident with a new 406 MHz ELT, although it activated, it was not detected by the SARSAT system because the antenna was separated from the ELT. Even when a 406 ELT is activated by an accident, the search and rescue people uses the 121.5 MHz signal to home in to the exact location. The frequency is still in use as the emergency frequency and when ELT's activate, they are heard by ATC facilities who always monitor the frequency and aircraft that also monitor the frequency.

New aircraft being produced only install the new ELT. Over time, many aircraft owners have migrated to installing the newer 406 MHz ELT. They have done this for several reasons:

1. Because of the advantage of the ELT being detected by SARSAT.
2. Because of the advantage of GPS providing a very accurate position.
3. Because of very short time between activation and determination by SAR the ELT was activated
4. Batteries for some of the older units are becoming expensive and scarce
5. As older units fail, manufacturers are not making the 121.5 MHz units

These advantages will eventually result in the migration to the newer ELT standard without requiring the heavy hand of the FCC to make regulations in an area that should be dealt with by the FAA.