

A mandatory upgrade to 406 Mhz ELT for Part 91 operators below 12,500 pounds is unnecessary. Personnel locator beacons, and satellite based locators, as well as everyday items such as cellular phones have supplanted the requirement for automatic locator beacons. Automatic beacons frequently fail or, as evidenced by other crashes, the antenna is severed, rendering the beacon useless.

121.5 Mhz ELT's are still useful for final location by air or ground search teams. While many GA aircraft owners and operators will choose to install a new 406 Mhz ELT, a fleetwide mandate to upgrade to a \$1500 installed ELT is unnecessary as an equivalent level of safety can be met by other means.

Thanks,  
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