

January 23, 2015

The Honorable Michael P. Huerta
Administrator, Federal Aviation Administration
800 Independence Ave, S.W.
Room 1010
Washington DC 20591

Administrator Huerta,

As representatives of tens of thousands of aircraft owners and operators, we are writing today to ask for the FAA's support in resolving compliance issues and to certify new and lower-cost solutions that will assist general aviation in meeting the Agency's 2020 ADS-B Out mandate. We are seeking your support to identify, certify, and make available low-cost equipment that will allow for maximum participation in ADS-B. Our organizations are committed to working with the FAA and industry to achieve these goals.

The FAA has taken on the mammoth task of modernizing our nation's air traffic management system, and the agency's efforts to improve safety and efficiency are to be commended. Safety is of the utmost importance to general aviation operators as well, and we believe that it is in the best interests of the entire aviation community to see full participation in ADS-B equipage by 2020. We do not support limiting access to airspace that pilots and aircraft owners enjoy today.

While we look forward to universal participation in ADS-B, as of January 1, 2015, only 8,800 general aviation aircraft had equipped to meet the FAA's mandate. The high cost of equipage and the lack of certified solutions for some aircraft owners, as well as ongoing challenges identified by a 2014 Department of Transportation Inspector General's report all stand in the way of equipage by the general aviation fleet. Unless these issues are resolved swiftly, we, unfortunately, can expect to see a significant reduction in general aviation activity when the ADS-B Out mandate takes effect on January 1, 2020.

While there are many cost variances associated with equipage, it is clear that the cost of meeting the ADS-B Out mandate continues to be a serious obstacle for many aircraft owners. A study conducted by AOPA identified 81,564 certified, registered piston-powered aircraft valued at \$40,000 or less. For owners of such aircraft the price to equip can be prohibitive.

For a refurbished 1967 Cessna 150 being sold for \$34,000 with a Mode C transponder and a VFR GPS, the least expensive certified solution now available is an "all in one" ADS-B Out/In box that includes a position locator but does not provide in cockpit display capabilities. Including installation, the price is approximately \$5,000 or 15% of the aircraft's value just for the aircraft owner to continue to fly in the same airspace he or she uses today.

Here's a breakdown of the costs for the example above:

ITEM	MINIMUM COST	Percentage of Aircraft Value
ADS B OUT/IN Unit	\$4,000	12%
Installation	\$1,000	3%
Total Cost	\$5,000	15%

For the owners of experimental aircraft and many Light Sport Aircraft, the situation is both confusing and difficult. ADS-B compliance requires a supplemental type certificate or new type certificate for the aircraft where it will be installed. But since experimental aircraft, by definition, are one of a kind and do not have type certificates, no supplemental type certificate can be issued.

The problem is very much the same for factory build Light Sport Aircraft. Since only the manufacturer can approve the installation of avionics in the airplane, there can be no supplemental type certificate and no avionics installation facility can seek a field approval, making it impossible for individual owners to equip without prior action by the manufacturer.

Similar problems exist for those who purchase new glass-panel aircraft today and for many Part 25 operators. For thousands of these aircraft owners, too, no path to compliance currently exists.

Also of concern to the general aviation community is the effect the ADS-B mandate will have on small airports located within or under airspace where Mode C is required today. An analysis by AOPA indicates that there are 1,339 airports located under or within what will be ADS-B-ruled airspace. Reduced operations at these airports will have significant negative economic impacts for the fields, airport-based businesses, and communities they serve.

Finally, the Department of Transportation Inspector General's report released in September 2014 revealed numerous significant problems that must be addressed in order for ADS-B to deliver on its promises. The issues identified by the IG report include gaps in coverage, technical and training issues, data integrity concerns, cost overruns and delays, and more. The general aviation industry stands ready to assist the FAA where we can in addressing these matters.

In light of these issues and on behalf of our members, we appreciate that the FAA recognizes the equipage challenge through its formation of the "Equip 2020" meetings and we believe that the pathway to affordable alternative solutions, including portable solutions, are possible today. However, it is also imperative that the FAA's technical standards office make working with equipment manufacturers and our organizations its highest priority in order to meet this mandate on general aviation.

Failure to do so will hamper participation in ADS-B, prevent the full realization of safety benefits, reduce general aviation activity, and create economic hardships. That's why we ask the FAA to be an active partner and commit its Flight Standards and Technical Operations team to work with stakeholders in identifying cost drivers in the current ADS-B Out technical standards and develop alternative solutions that leverage technology to drive down these cost barriers.

By working together we can help the general aviation community meet the FAA's mandate and improve safety for all airspace users. We look forward to working with you to ensure that all segments of the aviation system can participate in a more modern, safe, and efficient airspace system.

Sincerely,



Mark Baker
Aircraft Owners and Pilots Association



Jack Pelton
Experimental Aircraft Association



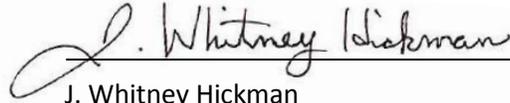
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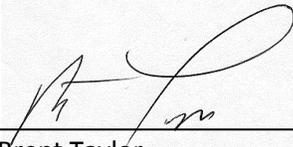
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