



October 28, 2014

**Mark R. Baker**  
President and CEO

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

Dear Administrator Huerta,

Thank you for arranging today's "call to action" summit on ADS-B equipage. All of us at AOPA appreciate your recognition of the serious challenges and consequences facing the general aviation community when it comes to equipping for ADS-B and look forward to having the opportunity to express our concerns at the meeting.

Recent statements from Deputy FAA Administrator Michael Whitaker have made it clear that you intend to hold to the January 1, 2020 mandate issued by FAA for aircraft to be equipped for ADS-B Out. Unfortunately, we believe that the mandate will be unworkable unless we act to address these concerns.

Five years have passed since the mandate was put in place, and some of the assumptions underpinning specific requirements may no longer be valid.

Therefore, we urgently request that you address the findings of the recent Department of Transportation Inspector General's report; the economic impact to general aviation of the mandate as written; review the changes that have taken place since the mandate was finalized, including portable in-cockpit technology like iPads; consider the average value of general aviation aircraft today; and account for the logistical challenges of meeting the timeline, including the availability of equipment, qualified technicians, and shop time needed to install it.

While the cost to equip has come down somewhat, it is still far too high for many general aviation operators who cannot recoup their investment from paying passengers.

A study of the registered GA fleet conducted by AOPA this month shows that, at a minimum, the GA fleet includes 81,564 certified, registered, piston-powered aircraft that are valued at \$40,000 or less. This figure represents 43% of the total piston-powered, fixed-wing, certified, general aviation airplane fleet. Because of the challenges associated with valuing experimental aircraft, they were not included in this study, but it is reasonable to expect that the addition of such aircraft would significantly increase the numbers of fixed-wing GA aircraft valued at \$40,000 or less.

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For many who own aircraft of this type, installing equipment that costs a minimum of \$5,000 to \$6,000 is simply beyond their reach, especially given the fact that ADS-B Out will allow these pilots only to continue operating as they do today without providing them any additional benefits. Many of our members have told us that they will simply have to ground their airplanes if the costs to equip do not come down significantly. This could prove a significant setback to the general aviation industry at a time when it is just beginning to recover from a prolonged recession.

From the beginning, AOPA has asked that general aviation aircraft be allowed to use handheld equipment to meet the mandate. Today, there are numerous affordable, portable solutions that can provide ADS-B In information to the cockpit. The general aviation community needs similar types of affordable solutions to meet the FAA's ADS-B Out requirements. We ask that you revisit this issue in light of the current state of technology.

FAA has announced that it has completed the necessary ground-based infrastructure for ADS-B, at the same time acknowledging some 200 coverage gaps that will require additional funding and infrastructure to cover. Even when these gaps are filled, the system will not provide coverage to large areas of the country not served by radar today. Many GA aircraft operate primarily in these areas where they will receive no benefits from ADS-B equipment, which they still must have to transit busy airspace. Again, we ask that you address this issue as part of an overall effort to deliver value through ADS-B.

These are just a few of the issues that have precluded widespread general aviation equipage and will continue to pose significant problems if they are not addressed.

General aviation is the cradle for all forms of aviation activity, training pilots, supporting businesses of all types, delivering a wide range of humanitarian and charitable services, supporting law enforcement and medical rescue activities, and much more. It would be irresponsible to insist on enforcing a mandate that does not reflect the realities of general aviation flying and would cause irreparable harm to this industry.

In light of these issues, the FAA must consider alternative and far less expensive ways to meet this 2020 mandate.

We strongly believe there are alternative means to ensuring that plans for a satellite based air traffic management system can be implemented with the widespread participation of the general aviation community. We look forward to having the opportunity to raise these concerns at the upcoming summit and to working with you to ensure that general aviation can be a full participant in air traffic modernization.

Sincerely,



Mark R. Baker

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