



AIRCRAFT OWNERS AND PILOTS ASSOCIATION

421 Aviation Way • Frederick, MD 21701-4798
Telephone (301) 695-2000 • Fax (301) 695-2375
www.aopa.org

September 13, 2007

Mr. Nick Sabatini
Associate Administrator for Aviation Safety
Federal Aviation Administration
AVR-1, Rm. 1000W
800 Independence Ave., SW
Washington, D.C. 20591

Mr. Sabatini, *Nick,*

The Aircraft Owners and Pilots Association (AOPA), representing more than 413,000 members, or two-thirds of the nation's general aviation pilots, is stating our position in response to the National Transportation Safety Board's (NTSB) recommendation A-07-51, which advocates that all applicable aircraft be required to equip with a 406 MHz frequency emergency locator transmitter (ELT) "at the earliest possible opportunity."

AOPA *opposes* a mandate requiring aircraft owners to replace their existing ELTs with 406 MHz ELTs. The FAA should continue to permit the *voluntary* equipage of aircraft with a 406 MHz ELT.

Currently, almost all general aviation aircraft are required to carry and maintain an ELT by 14 CFR 92.207 as a direct result of Congressional mandate. This regulation allows for either 121.5 MHz or 406 MHz units with the overwhelming majority of general aviation aircraft being equipped with 121.5 MHz units.

The benefits and limitations of these units must be balanced against the cost and needs of the individual aircraft owner. The current cost of a 121.5 MHz ELT is approximately \$200 per unit, while a 406 MHz ELT costs between \$1,000 and \$1,800 per unit (uninstalled). Installation costs could easily double or triple the costs of the units depending on the type of aircraft in which the unit will be installed. The cost to re-equip the entire U.S. general aviation fleet could exceed a half a billion dollars.

Because of the varied environment and operations that general aviation aircraft fly and participate in, the association supports allowing the owner/operator of the aircraft to determine if the installation of 406 MHz ELTs is warranted.

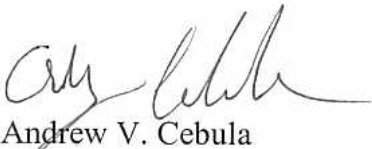
It is also important to note that as the FAA transitions to the Next Generation Air Traffic Control System (NextGen) and specifically to Automatic Dependant Surveillance –

Mr. Nick Sabatini
Page 2
September 13, 2007

Broadcast (ADS-B), the benefits of the 406 MHz ELTs may be negated. ADS-B will provide improved flight tracking service for aircraft. In the event of an emergency, ATC would be able to provide the last known aircraft position, to within seconds to rescuers.

When reviewing the ELT issue, AOPA urges the FAA to consider the widely varied nature of aviation operations, existing technology and future equipage mandates decisions. AOPA contends that there is not a need for a regulatory mandate for the 406 ELT.

Sincerely,



Andrew V. Cebula
Executive Vice President
Government Affairs

cc: James Ballough, FAA
Mark V. Rosenker, NTSB