



**AIRCRAFT OWNERS AND PILOTS ASSOCIATION**

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November 1, 2007

Docket Management Facility  
U.S. Department of Transportation  
1200 New Jersey Avenue, SE  
West Building Ground Floor, Room W12-140  
Washington, DC 20590-0001

Re: Docket Number FAA-2007-29305

On behalf of more than 414,000 members, the Aircraft Owners and Pilots Association (AOPA) requests a 60-day extension to the comment period for the Federal Aviation Administration (FAA) Notice of Proposed Rulemaking (NPRM) for Automatic Dependant Surveillance - Broadcast (ADS-B) Out performance requirements to support Air traffic Control (ATC) service. In the Federal Register notice the FAA states that aircraft owners will invest between \$1.27 billion and \$7.46 billion in avionics equipment over the next 12 years. This will be a significant investment by the general aviation community.

Because of the need to educate the members of AOPA on the cost and benefits of the proposal and provide ample time for members of the general aviation community to respond, the comment period needs to be extended beyond January 3, 2008.

As AOPA analyzes the FAA's approach to ADS-B implementation, there are serious questions raised by the NPRM. More time is needed to assess questions surrounding making a final rule that is financially feasible for general aviation, improves ATC services at general aviation airports, results in user cost avoidance, and improves general aviation safety.

To that end, extra time is needed to provide the necessary feedback on how to achieve those goals from a general aviation perspective. We appreciate your timely consideration of this request, and look forward to your response.

Sincerely,

Andrew V. Cebula  
Executive Vice President  
Government Affairs