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November 10, 2009

Mr. Vincent Capezzuto
Program Manager
Surveillance and Broadcast Services
Federal Aviation Administration
700 Independence Avenue
Washington, DC 20591

Re: TIS-B broadcast for UAT receivers

Dear Mr. Capezzuto:

On behalf of more than 415,000 members, the Aircraft Owners and Pilots Association (AOPA) supports the Federal Aviation Administration (FAA) efforts to accelerate the benefits of the Next Generation Air Transportation System (NextGen). With a minor configuration change, pilots equipped with receive-only Universal Access Transceiver (UAT) Automatic Dependant Surveillance-Broadcast (ADS-B) systems would have immediate access to safety and efficiency benefits enabled from Traffic Information Services-Broadcast (TIS-B). The change also accelerates NextGen for general aviation, and enhances safety and utility.

Statistics obtained from AOPA member surveys indicate that general aviation pilots invest in technologies that save lives, and make flying easier and more enjoyable. The rapid and nearly universal equipage with Global Positioning System navigation (without mandates) is an excellent example that we believe should be a model for other safety technologies and services, including ADS-B.

Currently, the FAA's TIS-B service is only available to pilots who transmit ADS-B information. Even when TIS-B is broadcast as a result of the ADS-B aircraft's proximity to the ADS-B ground station, the number of aircraft targets is limited. The result is that pilots not equipped with ADS-B transceivers are restricted from accessing essential traffic proximity information that would otherwise be available if the ADS-B ground stations broadcast all available TIS-B traffic continuously. AOPA's experience with ADS-B and TIS-B for nearly a decade confirms that continuously broadcast TIS-B is beneficial and valuable.

Limiting TIS-B may be appropriate for the 1090 Extended Squitter (1090 ES) ADS-B system because the FAA is carefully managing frequency spectrum demand, and working to ensure that the performance is adequate. However, the UAT frequency spectrum is not

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expected to have the same congestion challenges, so this request should have no adverse affects on UAT spectrum performance.

Although costs to modify the UAT TIS-B configuration are unknown, it appears to be a rather minor change that if executed now, could be standard on the remaining ground stations. AOPA requests that the FAA amend their strategy, and broadcast all TIS-B traffic data continuously, so that UAT receivers can receive the information.

We appreciate your consideration, and eagerly anticipate your response in support of this NextGen acceleration initiative.

Sincerely,

A handwritten signature in black ink, appearing to read "Heidi J. Williams", with a long horizontal flourish extending to the right.

Heidi J. Williams
Senior Director
Airspace and Modernization