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June 6, 2011

Mr. John Warner
Manager, Operations Support Group
Western Service Center; Federal Aviation Administration
Docket No. 11-AAL-11NR
1601 Lind Avenue SW
Renton, WA 98057

Re: Docket No. 11-AAL-11NR, Proposed Decommissioning of the Summit Non-Directional Beacon

Mr. Warner,

The Aircraft Owners and Pilots Association (AOPA), representing more than 400,000 members nationwide, submits the following comments in response to the Federal Aviation Administration's (FAA) proposed decommissioning of the SUMMIT (UMM) Non-Directional Beacon (NDB) facility located near Cantwell, Alaska. AOPA objects to the decommissioning of this Navigational Aid (NAVAID) based on the lack of alternative ground-based NAVAIDs and the impact on general aviation flight safety.

Many pilots have reported to AOPA that they utilize the UMM NDB for their enroute navigation through mountainous terrain. Alternative ground-based NAVAIDs are located more than 60 miles away and suffer from a lack of line of sight necessary for Very High Frequency (VHF) signal acquisition, making them unusable in this region. While some pilots in the area utilize Global Positioning Systems (GPS) for navigation, there are frequent Notices to Airmen (NOTAMS) issued advising of GPS outages making this an unreliable alternative, and one only available to aircraft that are suitably equipped. The Cantwell, AK area in particular suffers from poor GPS signals due to its proximity to Mt. McKinley. With no alternate ground-based navigation option and unreliable GPS signal coverage, pilots are placed in grave danger with no navigational facilities available to them. The loss of this NAVAID combined with a frequently unreliable GPS signal presents an unacceptable risk to pilots in the Cantwell, AK area.

AOPA supports the navigation transition from a ground based to a satellite based system. However, that transition to a performance based navigation system must occur without a loss of access to our nation's airports and airway system. Without alternate ground-based NAVAIDs, the magnitude of impact caused by this decommissioning is too great and would substantially degrade the availability of instrument navigation in the region. While we appreciate the FAA's efforts to reduce expenses, general aviation cannot afford to lose critical, all weather, enroute navigation in the National Airspace System. AOPA requests that the FAA withdraw its proposal to decommission the UMM NDB.

We appreciate the opportunity to submit comments on this proposed decommissioning.

Sincerely,

Patrick Smith
Aviation Technical Specialist