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August 31, 2017

Mr. John Barbagallo
U.S. Department of Transportation
Docket Operations, M-30
1200 New Jersey Avenue SE
West Building Ground Floor, Room W12-140
Washington, DC 20590-0001

Re: *FAA Docket Number FAA-2017-0782; Notice of Proposed Rulemaking for Use of Automatic Dependent Surveillance-Broadcast (ADS-B) Out in Support of Reduced Vertical Separation Minimum (RVSM) Operations*

Dear Mr. Barbagallo,

The Aircraft Owners and Pilots Association (AOPA), the world's largest aviation membership association, submits the following comment in support of the Notice of Proposed Rulemaking for the use of Automatic Dependent Surveillance-Broadcast (ADS-B) Out to support Reduced Vertical Separation Minimum (RVSM) operations. We believe the proposed modifications to Part 91 will result in significant cost and time savings for general aviation and the FAA, while ensuring no degradation to safety. As ADS-B Out equipage will be necessary for those aircraft operating at RVSM altitudes in the near future, this rule change has the opportunity to positively reduce the administrative burden placed on hundreds of operators.

AOPA believes this rule takes an important step in removing an unnecessary bureaucratic approval process that is no longer justifiable as pilots equip with advanced NextGen technology. ADS-B Out technology offers an opportunity for advanced altitude conformance monitoring without a lengthy and labor-intensive paperwork exercise. The current RVSM approval process is time-consuming and expensive for general aviation operators, but it is necessary for most turbojet and turboprop owners to go through it, despite the high initial cost, as operating below RVSM-approved altitudes can be significantly higher over time. It is important the FAA leverage new technology to reduce expenses, including those incurred during the approval process, as it further increases the benefits for aircraft owners who equip.

In conclusion, AOPA supports the proposed changes to Part 91 and encourages the FAA to continue to work with industry partners to identify other rules and processes that are unnecessary or redundant. Providing aircraft owners incentives to equip with NextGen technology ensures more owners see the benefit and do equip. We appreciate the FAA's effort to reduce the cost and complexity for accessing RVSM airspace. Thank you for reviewing our comment on this important issue.

Sincerely,

Rune Duke
Director, Airspace and Air Traffic