



March 3, 2020

Mr. Rodrigo Vásquez Colmenares Guzmán  
Director General de la Agencia Federal de Aviación Civil (AFAC)

Mr. Victor Manuel Hernandez Sandoval  
Director General de Servicios a la Navegación en el Espacio Aéreo Mexicano (SENEAM)

RE: Harmonization of Mexican and U.S. Automatic Dependent Surveillance-Broadcast (ADS-B) Rules

Dear Mr. Rodrigo Vásquez Colmenares Guzmán and Mr. Victor Manuel Hernandez Sandoval:

On behalf of the Aircraft Owners and Pilots Association (AOPA), which represents over 300,000 general aviation pilots, I am writing today to request the Agencia Federal de Aviación Civil (AFAC) and Servicios a la Navegación en el Espacio Aéreo Mexicano (SENEAM) support a broadening of Mexico's ADS-B rule to allow Universal Access Transceiver (UAT) ADS-B systems operating on the frequency of 978 MHz.

We believe harmonizing the Mexican and U.S. ADS-B rules would be another positive step towards facilitating seamless cross-border travel and would build on the success of Mexico's recognition of BasicMed.

Tens of thousands of U.S. aircraft owners equipped their aircraft with a UAT system in order to be rule compliant with the FAA's 2020 mandate. I believe there are safety and efficiency benefits in allowing UAT equipped aircraft to be rule compliant in Mexico, in addition to those aircraft owners equipped with 1090 Extended Squitter (ES) systems. Allowing UAT systems to be rule compliant in Mexico also offers more affordable ADS-B solutions to Mexican general aviation operators.

I understand from AFAC's December 13, 2019, circular announcing an extension to the ADS-B mandate that the Mexican ADS-B surveillance system is still being completed. Now is a critical time to support harmony between the Mexican and U.S. ADS-B surveillance systems. I believe there would be many benefits to Mexican and U.S. air traffic controllers being able to have the same picture and to be able to surveil UAT and 1090ES ADS-B equipped aircraft. Our understanding is the cost difference for including the UAT capability in ADS-B ground-based transmitters is minimal.

Aircraft owners in the U.S. are being offered the option to equip with either UAT or the 1090ES datalink, but the 1090ES system does not allow for one of the primary benefits of ADS-B to general aviation—graphical weather and airspace information in the cockpit. The UAT system has proven to be affordable and easy to install such that thousands of aircraft owners are choosing this solution. The FAA reports about 30,000 U.S. aircraft have a UAT system, which are almost all small general aviation aircraft. This number continues to grow as UAT systems are quite popular with those not yet equipped, who are primarily general aviation operators.

In 2017, AOPA conducted a survey of our membership regarding international travel. In the past three years, approximately 60% of the respondents flew cross-border 1 to 5 times while 20% traveled across a border as pilot in command more than 10 times. Among general aviation destinations, Mexico was one of

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the most visited countries with 26% of pilots having flown there. Two-thirds of the respondents' trips were specifically for personal reasons, such as tourism. On a typical trip, general aviation pilots and passengers will contribute to the economy through the purchase of fuel, visiting stores and restaurants, and buying hotel rooms. These expenditures support local taxes, payroll, and business development.

Americans account by far for the largest number of visitors to Mexico. According to the Secretariat of Tourism, each international tourist spent on average \$490 U.S. dollars. A general aviation visitor likely contributes more than that because of fuel charges and other aeronautical expenses.

Based on the FAA's latest cross-border data, AOPA conservatively estimates that there are approximately 25,000-30,000 U.S. general aviation flights to Mexico each year. This large number of flights indicates tens of millions of U.S. dollars are being spent annually just from general aviation. Furthermore, it is notable that many of these dollars are being spent in small Mexican towns, with small airports, and not just large tourist cities.

We hope you will carefully consider the impact the proposed ADS-B mandate would have on these operators and their ability to continue to fly in Mexico. To continue to entice U.S. aviation tourists and business, it is important the ADS-B mandate allow UAT equipped aircraft to be compliant. Mexico implementing a ground-based surveillance system that enables UAT and 1090ES equipped aircraft to be surveilled would facilitate seamless operations between both countries.

In conclusion, we respectfully request that AFAC and SENEAM consider investing in an ADS-B ground-based surveillance system that is compatible with the U.S. surveillance system and that will allow both UAT and 1090ES aircraft to be rule compliant. Amending the existing Mexican ADS-B rule to allow UAT equipage promotes a safe and efficient aviation experience when flying between the U.S. and Mexico.

We support AFAC's and SENEAM's goal to seek safe and economical solutions that support the general aviation community. We appreciate the extension to the ADS-B mandate and are willing to work collaboratively to ensure the Mexican mandate is successful. Please contact Rune Duke, our Senior Director of Government Affairs, at 202-737-7950, if you have any questions or need additional information.

Sincerely,



Mark R. Baker  
President and CEO

CC: Lorrie Fussell, Office of International Affairs, Federal Aviation Administration  
Alex J. Rodriguez, Office of International Affairs, Federal Aviation Administration