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Air Transport Association

March 28, 2000

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

The Honorable William E. Kennard
Chairman
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Dear Chairman Kennard:

Our purpose in writing is to provide you with some of our thoughts regarding the Federal Communication Commission's (FCC) review of issues related to the Global Positioning System (GPS) and ultra-wideband (UWB) communications and radar systems. The focus of our interest in this issue is safety, which has been and will continue to be our number one priority and must never be compromised.

As you know, the aviation industry is increasingly dependent on GPS satellites for navigation, positioning and timing benefits. GPS is a critical component of efforts to modernize and improve air traffic management in our country and, indeed, throughout the world. Rest assured, we are not opposed to the use of UWB technology and we have no conflicting commercial interests with the UWB manufacturing community. Rather, we are concerned over the *potential*, but as yet unconfirmed, risk of UWB devices radiating into restricted GPS bands.

Unlike traditional two-way communications services, broadcast GPS is vulnerable to interference from background noise. We are concerned about *any* activity that would interfere with the industry's use of GPS. For example, domestic UWB applications have the *potential* to raise the noise floor in the band used by GPS above receiver sensitivity at critical phases of flight and at unpredictable times and locations. Without thorough testing, the potential also exists that individual UWB devices used near airports could pose safety hazards.

In the international arena, the safety-of-life spectrum designation has been allocated by the International Telecommunications Union (ITU) and accepted by the International Civil Aviation Organization. The United States, at technical meetings of the ITU, has maintained that the public safety margin for GPS is extremely limited; as you know, this safety margin has already been diminished by emissions from other communications services.

AOPA AIRCRAFT OWNERS AND PILOTS ASSOCIATION

Aerospace Industries Association

NBAA

RAA

CARGO AIRLINE ASSOCIATION

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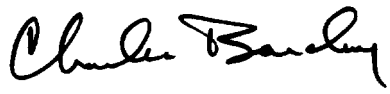
Chairman Kennard, we are very supportive of encouraging the development of new technologies. We do not suggest in any way that UWB is without merit. To the contrary, it is possible that this technology holds great promise for a variety of applications, including emergency services and security applications. We support policy determinations that pave the way for new technologies so as to increase our productivity and ensure our Nation's competitiveness.

However, we believe the use of new technologies, including UWB, must not be permitted if this compromises aviation safety. It may well be possible to harmonize the use of UWB technologies with the GPS (for instance, these devices can be designed to filter, or "notch-out", restricted GPS bands to protect public safety). No devices should be deployed, or uses permitted, that would pose an interference risk to GPS users.

Therefore, we urge the Commission not to take any final action on this matter until technical analyses and operational demonstrations have been completed, so as to ensure that unwanted emissions do not encroach into the safety-of-life GPS bands. And, recognizing the value of moving new technologies quickly to market, we suggest that the study be conducted as quickly as is possible and still generate sound data. We further urge the Commission to pursue mechanisms that would both permit the deployment of new worthwhile technologies and ensure safety.

In closing, our continuing goal is to maintain the highest levels of aviation safety. Our nation is already dependent on GPS as a utility and critical infrastructure in many sectors, including aviation, marine, agriculture, space, recreation, surface, environmental, rail, and timing. The United States already derives economic, social and national security benefits from the GPS system, and additional uses will emerge in the future. We urge the Commission to take appropriate steps to ensure a consistent United States policy relating to GPS so as to guarantee the safety of air passengers and to further the deployment of compatible services in the years to come. Thank you for your consideration of our comments.

Sincerely,



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cc: The Honorable Rodney Slater, Secretary, Department of Transportation
The Honorable Jane Garvey, Administrator, Federal Aviation Administration
The Honorable Greg Rohde, Administrator, NTIA
Chairman & Ranking Member, Senate Commerce Committee
Chairman & Ranking Member, Senate Aviation Subcommittee
Chairman & Ranking Member, Senate Communications Subcommittee
Chairman & Ranking Member, House Commerce Committee
Chairman & Ranking Member, House Telecommunications Subcommittee
Chairman & Ranking Member, House Transportation & Infrastructure Committee
Chairman & Ranking Member, House Aviation Subcommittee

Air Transport Association

ATA News

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For Immediate Release
Tuesday, March 28, 2000
Contact: Diana Cronan
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Aviation Groups Address Ongoing FCC Review of Global Positioning System and Ultra-Wideband Technologies

Express Potential Concerns Regarding Aviation Safety

(Washington, DC) – The Air Transport Association (ATA) joined several aviation groups today in contacting the Federal Communications Commission (FCC) to urge a careful and thorough review of issues related to the Global Positioning System (GPS) and ultra-wideband (UWB) communications and radar systems. With the protection of aviation safety as their top priority, the industry urged the Commission not to take final action on the matter until technical analyses and operational demonstrations are completed.

In their joint-letter, the Air Transport Association (ATA), American Association of Airport Executives, General Aviation Manufacturers Association, Aerospace Industries Association, Regional Airlines Association, Airports Council International-North America, Aircraft Owners & Pilots Association, National Business Aviation Association, Cargo Airline Association and National Air Carrier Association expressed their concerns over any activity that could potentially interfere with the aviation industry's use of GPS – used for navigation, positioning, and timing. Domestic UWB applications have the potential to raise the noise floor in the band used by GPS at critical phases of flight and at unpredictable times and locations. Since GPS is vulnerable to interference from background noise, there is concern about compromising aviation safety.

The letter emphasizes the group is not opposed to UWB technology, but concerned with potential interference from UWB devices radiating into restricted GPS bands. In addition, the group is supportive of advancing the development of new technologies. "We do not suggest in any way that UWB is without merit. To the contrary, it is possible that this technology holds great promise for a variety of applications, including emergency services and security applications." The ultimate goal of the ATA and other industry groups is to maintain the highest levels of safety and to ensure that any forthcoming technology not compromise that safety.

The Air Transport Association is the nation's oldest and largest airline trade organization, with 23 U.S. and five international members. ATA member airlines transport over 95 percent of all passenger and cargo traffic in the United States.

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This press release, as well as past releases, can be accessed on the ATA Web site at: http://www.air-transport.org