

AIRCRAFT OWNERS AND PILOTS ASSOCIATION

421 Aviation Way • Frederick, MD 21701-4798 Telephone (301) 695-2000 • FAX (301) 695-2375 www.aopa.org

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US Department of Commerce Washington, DC 20230

The Aircraft Owners and Pilots Association (AOPA) thanks you for the opportunity to preview the President's policy on Space Based Positioning, Navigation and Timing (PNT). Outreach to the civilian community is evidence of the Administration's efforts to shine the spotlight on the diversity of GPS users in the United States.

AOPA represents over 400,000 pilots and many of them utilize the Global Positioning System (GPS) and the Wide Area Augmentation System (WAAS) systems for their primary means of electronic navigation. AOPA members increasingly use GPS positioning for terrain avoidance techniques where the terrain is graphically depicted on a computer screen onboard the aircraft.

In general, AOPA is pleased to report that the draft policy is a major improvement over the 1996 policy because it, (1) acknowledges the substantial civilian use of GPS and (2) commitments to establish a new space based PNT executive committee and associated government/industry advisory committee.

AOPA has four concerns related to the draft policy. These concerns include (1) the need for clear, unwavering support for civilian use of GPS, (2) procedures for aggressive interference elimination, (3) ensuring that the Department of Defense (DOD) jamming of GPS for necessary training minimally impacts civilians, and (4) ensuring sufficient lead time for transitioning to new GPS navigation systems.

As you are aware the Federal Aviation Administration (FAA) now permits pilots equipped with certified WAAS avionics to operate without any other electronic navigation system in the aircraft. This places substantial reliance on the GPS White House PNT Policy Page 2 June 11, 2004

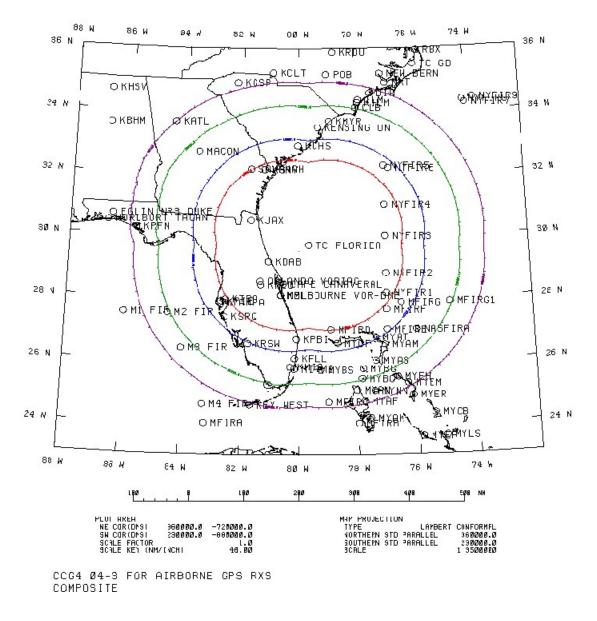
and WAAS. Taxpayers using GPS for civilian applications require sufficient availability, integrity and performance for safety of life applications.

While it is recognized that Space Based PNT is largely retained for the protection of the United States globally as well as for homeland security, we respectfully submit that any differing levels of GPS services to civilians should be transparent to the civil user. In other words, the civilian users need to have every assurance that space based PNT is accurate and reliable.

According to the briefing, the Department of Homeland Security (DHS) is now the lead in GPS interference mitigations. AOPA is unfamiliar with the process that the DHS will use during a GPS interference event and are unaware of any DHS coordination with aviation users. GPS interference is often difficult to identify and when it is, the FAA has traditionally disseminated the outage to the flying community. However it is AOPA's observation that the Government has been slow to disable either intentional or accidental GPS interference transmitters. AOPA is dismayed at this slow reaction time and will be looking for a strong commitment for aggressive mitigation in this PNT policy. AOPA recognizes that certain legal obligations must be fulfilled and protocols must be adhered to when trying to disable such a transmitter. However, the lives of many are impacted by such outages and the longer it takes to mitigate an interference source, the higher risk of an accident.

Because so many pilots rely on GPS for their positioning and navigation, the DOD jamming of GPS for training also has an adverse affect. A graphic of one such DOD jamming event is provided for you below (graphic 1 next page). Please note the massive size of the affected area, even at relatively low altitudes. The red (innermost) circle is 4,000 feet above the sea level, and the entire width of Florida is impacted. AOPA recommends that the President's policy acknowledge that while these training missions will continue, that they will do so only inside military designated airspace and multiple missions will be accomplished simultaneously to ensure the impact on civil users is minimized.

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Graphic 1. Sample DOD GPS jamming impact area

Lastly, AOPA requests that the President's policy acknowledge that any changes to the GPS signal will be coordinated with several years of advance notice so that a transition to the new GPS receivers can happen easily without undue burden on the civil users.

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Thank you for the opportunity to provide this feedback. We look forward to hearing that the policy has been released. If you have any questions pertaining to our input, please do not hesitate to contact me at 301-695-2211.

Sincerely

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Randy Kenagy Senior Director, Advanced Technology Government and Technical Affairs