



AIRCRAFT OWNERS AND PILOTS ASSOCIATION

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**Phil Boyer**

President

May 1, 2006

The Honorable Marion Blakey  
Federal Aviation Administration  
800 Independence Ave., SW  
Washington, DC 20591

Dear Administrator <sup>Marion</sup>Blakey:

Representing the more than 408,000 members of the Aircraft Owners and Pilots Association (AOPA), I am writing to urge the FAA to continue operating the Long Range Navigation (LORAN) system beyond fiscal year 2006 (FY2006). As you know, there are on-going discussions about the necessary positioning and navigation components of the aviation system, including using Global Positioning System (GPS) exclusively. And, with recent decisions to deploy Automatic Dependant Surveillance-Broadcast (ADS-B), the requirement for backup positioning becomes much more critical. Since GPS appears to require a backup with similar performance characteristics, the FAA and aviation industry are looking at various technology options. To keep LORAN available as an option for this role, LORAN should not be decommissioned.

The Department of Homeland Security (DHS) currently funds the operation of LORAN in the United States Coast Guard (USCG) budget. LORAN's infrastructure has been modernized and the enhanced LORAN navigation signals may be a viable positioning and timing signal for aviation in the role as a backup for satellite positioning, at no cost to the FAA or Department of Transportation.

Historically AOPA has supported LORAN because it was the first technology to provide general aviation pilots with a high performance area navigation (RNAV) capability. With the arrival of low-cost GPS, LORAN usage in aviation predictably declined. And as general aviation pilots began using GPS, AOPA members have continued use of the network of VOR's as their electronic navigation source. However, technical and financial limitations affect the viability of VOR as a long-term backup. In recent years the aviation landscape has changed significantly, and LORAN may still be necessary.

While the airlines have supported the DME/DME network as a backup for its operations, this is an unusable option for low-altitude operations. The proposal to retain, or even increase the DME network may make sense for high-altitude operators, but DME/DME alone will be useless to aircraft that operate at all 5,400 airports, or seldom fly higher than 18,000 feet.

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It is with this background that we are disturbed by the Coast Guard's recent proposal to shut down LORAN. Its surprise proposal to terminate LORAN at this juncture is shortsighted and would waste substantial FAA and taxpayer investment. The Coast Guard tack also ignores the existing agreement between Secretaries Mineta, Chertoff and others to jointly decide LORAN's future in 2006. It also ignores President Bush's, November 2004 Presidential Directive that restructured the management of GPS and gave the lead role for the civil uses of GPS to DOT. That charge includes GPS, its augmentations, *and* backups.

Therefore, AOPA urges the FAA to: (1) support the continuation of LORAN until a long-term backup strategy that adequately meets the needs of all aviation users is identified; (2) Direct RTCA to evaluate and validate LORAN's performance and viability as a backup navigation signal that supports RNP 0.3 performance and ADS-B requirements; and (3) Propose a LORAN oversight council consisting of DOT/FAA, DHS, DOC, DOD, and stakeholders (including AOPA) to guide the future development and operation of LORAN..

Given the apparent need for an affordable, robust GPS backup that has similar performance, and supports the positioning and timing needs of aviation, the decommissioning of LORAN by the U.S. Coast Guard is premature. Once gone, LORAN will no longer be an option, and any other suitable alternative for aviation would likely be more costly, take longer to implement, and would be the responsibility of the FAA exclusively. Let's look before we leap on this issue.

Sincerely,



Phil Boyer  
President