

Extensive Public Comment on Loran

As of this writing, the public comment to this docket has been limited. This may be due to several reasons, including:

- A Loran system is no longer in operation in the United States. Citizens are therefore not familiar with it, do not use it, and feel less engaged with the issue.
- PNT requirements are a relatively arcane issue that impact the entire population, but are only understood by a few.
- PNT is a “silent utility” like electricity, gas, and water. The general population is only truly aware of them when they are not there.
- Of the relatively small number of people who are engaged with the issue and do understand PNT requirements, many may be constrained from commenting publicly because of concerns about revealing vulnerabilities of the systems their companies offer, or about inadvertently revealing proprietary information.
- The last time the federal government requested public comment on Loran (2007) it received 978 comments from the public, 93% of which were in favor of retaining Loran as a complement and backup for GPS. In spite of this, and the recommendation of its own expert advisory board, the government terminated the system. As a result, some citizens may believe that the government is not sincere in its request for public input on this issue and view submitting comments as futile.

We strongly recommend that the US government consider, in addition to the responses to the current request for comment, the responses to Coast Guard, DHS, DOT Federal Register Notice [USCG-2006-24685] issued on January 8, 2007. With only a 30-day comment period, 978 comments were submitted by maritime, aviation and timing interests nationwide and internationally.

Some highlights of the responses:

- An overwhelming majority, 93% of those submitting comments, supported retention of Loran.
- About 40% of the comments were from maritime users.
- About 40% of the comments were from aviation stakeholders.
- Nearly 400 filings from aviation and maritime were from widely recognized, important stakeholders and stakeholder groups.
- About 8% of the filings (about 75 responses) observed that Loran is needed as a timing backup to GPS. Communications giant, Sprint-Nextel Corporation, was among those who made a compelling case for Loran.
- Several US government bodies and labs responded recommending retention of Loran, including:
 - Department of Energy National Nuclear Security Administration
 - Department of Energy Oak Ridge National Laboratory
 - Missile Range Commanders’ Council
 - National Transportation Safety Board

The following is a partial list of the organizations, associations, government agencies and business representing millions of marine, aviation and timing constituents who recommended keeping Loran:

Aircraft Owners and Pilots Association (AOPA)
(410,000 members)

American Pilots Association (members include
the licensed ocean-going pilots in 24 coastal
states, Great Lakes)

Andren Software

Annapolis Naval Sailing Association

Beach Haven Charter Fishing Assn (NJ)

Boat US (670,000 members)

The Boeing Company

Bristol Bay Driftnetters Association

C&C Technologies

California Department of Boating and
Waterways

Canadian Hydrographic Service

Chamber of Shipping of America

Chesapeake Bay Yacht Clubs Association (120
Yacht Clubs in DC, DE, MD, NJ, PA, VA)

Commercial Fishermen of America

Chronos Technology

Department of Energy National Nuclear Security
Administration

Department of Energy Oak Ridge National
Laboratory

E. N. Bisso

East Hampton NY Commercial Fisheries
Advisory Council

European Group of Institutes of Navigation (15
Countries)

General Lighthouse Authorities of UK and
Ireland

Global Timing Services LLC

Good Old Boat

Greater Point Pleasant Charter Boat Assn (NJ)

Huntingborg Airport (IN)

International Loran Association

Jersey Coast Anglers Association (75 fishing
clubs/30,000 boaters)

Jersey Coast Shark Anglers (NJ)

Lake Erie Fishing Club

Lake of the Woods County Board of
Commissioners (MN)

Maryland Airport Managers Association

Massachusetts Lobstermen's Association

Mass Design (NH)

Missile Range Commanders Council

National Air Transportation Association (2,000
member companies)

National Association of Charterboat Operators
(3,300 members)

National Business Aviation Association (8,000
member companies)

National Boating Federation (2,000,000
members)

National Marine Manufacturers Association
(1,600 manufacturers)

National Transportation Safety Board
(NTSB)/Marine Accident Investigator

Nautical Institute (6,500 members worldwide)

New England Wire Technologies

Northwestern Boating Council (20 Pacific
Northwest yacht clubs)

Ohio University Avionic Engineering Center

Outer Banks Commercial Fisheries (CA)

Oztek, Inc.

Radio Technical Commission for Maritime
Services (RTCM)

R&K Metal Products

Rapid Finishing Corporation

Regional Manufacturing Specialists, Inc.

Rhode Island Lobstermen's Association

Roanoke Aero Services

Round Valley Trout Association

Royal Institute of Navigation (3000 members
worldwide)

S.O.N.S. of Lake Erie Fishing Club (PA)

Salutary Technology

South Bay Cruising Club (NY)

Southern California Trawlers Association

Sprint-Nextel Corporation

Stringliner Company

Sweeney Metal Fabricators, Inc.

Tech-Mark Corporation

Trinity House (UK)

UNH Center for Ocean Engineering

Verotek

Westport Charter Boat Association (WA)