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 Lobstermens 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)