

Summary of Public Comments to US DOT on eLoran

On the 22nd of March 2015, the US Department of Transportation issued a notice in the [Federal Register](#)¹:

“...to seek comment from the public and industry regarding potential plans by the United States Government to implement an enhanced Long Range Navigation (eLoran) system as a complementary positioning, navigation, and timing (PNT) capability to the Global Positioning System (GPS).”

In response, the Resilient Navigation and Timing Foundation and 181 other organizations and individuals submitted comments to the federal docket. Of those:

- Roughly 94% advocated for the use of eLoran as a complementary positioning, navigation and timing system to GPS.
- 21 were from associations or companies, all but one of which supported implementing eLoran
- 18 of the submissions uploaded documentation to the docket

Submissions ranged from multiple documents to single sentences. The following organizes the comments by major theme, and provides links to each of the original submissions.

¹ A similar solicitation for comments was issued in 2007. A summary of the results of that effort is included at the end of this document.
The Resilient Navigation and Timing Foundation is a Scientific and Educational Non-profit, 501(c)3, Registered in the State of Virginia

Comments in support of eLoran (170)



Physical Attachments	Navigation	Backing-Up GPS	Economy & Industry	National Security	Cost-Effectiveness	General Support
	American Pilots Assoc. Aircraft Owners and Pilots Association Radio Technical Commission for Maritime Services Atlantic Offshore Lobstermens' Assoc.	Nickolaus Leggett Exelis The GPS Innovation Alliance Australian Maritime Safety Authority UrsaNav Alliance for Telecommunications Industry Solutions (COAST)	IPosi Inc. Automate Marine Systems	Jeff Cowan Chronos Technology Ltd. Continental Electronics Corporation Spectracom Corp	General Lighthouse Authorities	GMDSS Task Force Elmer Croan Tanadgusix Corporation Locata Corp. (Nunzio G)

Paragraphs or More	Navigation	Backing-Up GPS	Economy & Industry	National Security	Cost-Effectiveness	General Support
	Robert Lilley Michael Nutt Steven Flanagan David Cooper Tommy Harmon Peter Gilson Edward Majewski Steve Singler Juliean Galak	Lingwei Zhan John Hartline Don Young Brooke Clark Emadeldin Mubarak Tom Nolan Peter Swaszek Phil Railsback Patrick Wentworth	David Martin Patrick Warr David Louisiana Michael Christie Kenneth Fogle Michael Roskind	Anonymous Anonymous Ron Lee Thomas Lusch Robert Powell John Beukers James Farrell George Garbe Jon Hill	Roger Barnett David Hershberger Wendall Weidemann Bob Pokress Joe Coccia Anonymous Twain Braden	William Ben Welch John McHale Hugh Shane Robert Lilley Rex Buddenberg Guy Null

	<u>David Moskoff</u> <u>Captain Kevin Coulombe</u> <u>Wayne Gilham</u> <u>Ben Ellison</u> <u>Eugene Brusin</u> <u>Charles Linenfelser</u> <u>Rol Murrow</u> <u>Jeffrey Borelli</u> <u>Captain John</u> <u>Ronald Perry</u> <u>Daniel Farren</u> <u>Dan Riley</u> <u>Gerald Bourgeois</u>	<u>Tony Yacono</u> <u>John Allan</u> <u>Russell Morton</u> <u>Robert Gardner</u> <u>Greg Tylawsky</u> <u>Durk van Willigen</u> <u>Bob Cockshott</u> <u>Erno Bonebakker</u> <u>G. Lin Roth</u> <u>Mark Haggerty</u> <u>John Neff</u> <u>Douglas Espy</u> <u>Sidonie Sansom</u>	<u>Christopher Treib</u> <u>Michael Colby</u>	<u>David Cooper</u> <u>Joe Preston</u> <u>William Walsh</u> <u>Phil Yoder</u> <u>Keith Peshak</u> <u>Rae Willis</u> <u>Kim Taehwan</u> <u>Lindsay Fuller</u> <u>David Rubenstein</u> <u>Richard Bulova</u> <u>Robert Spitzer</u> <u>Gregory S.</u>	<u>Robert Burns</u>	<u>Raymond DeVine</u> <u>Ronald Dennison</u> <u>James Avilas</u> <u>John Olthuis</u> <u>Reid Sprague</u> <u>Paul Cheney</u> <u>Thomas Nolan</u> <u>Pauline Cook</u> <u>Nautel Maine Inc.</u> <u>Marl Halbrook</u>
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	Navigation	Backing-Up GPS	Economy & Industry	National Security	Cost- Effectiveness	General Support
Few Sentences or Less	William Haimes David Bentley Anonymous Anonymous Jeffrey Moskin Allan Garfinkle Merit McCrea Dan Gingras Brian O'Connell Ross Norsworthy Winn Brown Kelly Townsend	Benjamin Reed Russell Morton Martin Kingston Keith Jones George Stone Gus Schage Joe Safaryn Marlene Barrington Wayne Klepczynski Allen Stone Anonymous Anonymous	Jim Dall Sue Curran Kent Howell Simon Cotts	Marc Mularz Jerry Golabowski Dennis Frederick	N/A	David Willis Steven Jones F. Kerwin Christian Hempstead Robert Sheen Allan C. Stover

RNT Foundation Submissions in Favor of eLoran

The RNT Foundation provided ten separate submissions in favor of establishing an eLoran systems. These addressed the needs for Positioning, Navigation and Timing in each of six critical infrastructure sectors, as well as general information for the public record. To access these comments, click the links below.

Critical Infrastructure	General Information
<u>Communications Sector</u>	<u>eLoran Primer</u>
<u>Transportation Sector</u>	<u>eLoran Rationale and Rigor</u>
<u>Information Technology Sector</u>	<u>Extensive Public Comment on eLoran</u>
<u>Emergency Services Sector</u>	<u>Governance and Execution</u>
<u>Financial Services Sector</u>	
<u>Energy Sector</u>	

Submissions not in favor of eLoran (11)

GPS is Enough	eLoran is too complicated, complex, and costly	eLoran is outdated	Where's the Incentive?	Use VOR-DME-ILS (or R-Mode) system	Usage depends on configurability
Bob Bechler	Mark Boguski Greg Young	Gene McCall Anonymous Thomas Imrich Clifford Appel	Anonymous	Regional Air Cargo Carriers Association Gregory Johnson	Al Studt

Summary of comments from 2007 Federal Register

On 8 January 2007 the Department of Homeland Security requested public comment (Federal Register Notice USCG-2006-2468) <http://www.gpo.gov/fdsys/pkg/FR-2007-01-08/pdf/E6-22421.pdf> concerning:

“...the need to continue to operate or invest in the North American LORAN–C Radionavigation System beyond fiscal year 2007. Future investment decisions might include: Decommissioning the LORAN–C system, maintaining the LORAN–C system as currently configured, or developing a fully deployed Enhanced LORAN (eLORAN) system.”

Out of the 978 submissions received by the 2007 docket addressing the retention of Loran, 93% supported retention of the system as a complement and backup to GPS.

In summary:

- About 40% of the comments were from maritime users.
- About 40% of the comments were from aviation stakeholders.
- About 75 of the submissions 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 the 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

For more information about the comments submitted in 2007, please click [HERE](#)