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Docket Management Facility
U.S. Department of Transportation
1200 New Jersey Avenue, SE
West Building Ground Floor, Room W12-140
Washington, DC 20590-0001

Re: Docket Number DOT-OST-2015-0053 Complementary Positioning, Navigation and Timing Capability Notice; Request for Public Comment

The Aircraft Owners and Pilots Association (AOPA) submits these comments to the Department of Transportation's request for input on potential plans to implement an enhanced Long Range Navigation (eLoran) system as a complementary positioning, navigation and timing (PNT) capability to the Global Position System (GPS).

General Aviation (GA) aircraft use the GPS signal to navigate safely in the national airspace system. While proven to be extremely reliable, GPS is subject to interference that can be intentional or unintentional, natural or man-made. In today's system, when outages occur, GA operators revert to navigation using charts, dead reckoning and the existing radar and ground based legacy system.

AOPA understands the benefits of a back-up PNT source for GPS, due to the risk of disruptions to air commerce in the event of GPS outages. A widespread or long term, disruption could be harmful to the economy and the efficient movement of goods and services. For this reason, AOPA does not oppose provision of PNT back-up for GPS. However, the Association would oppose a mandate for GA to equip with eLoran as a back-up to GPS.

If eLoran is implemented as a back-up to GPS, and the FAA mandates that all users equip with eLoran, this requirement would potentially have a significant and negative impact on GA operators because of the cost to equip.

Further, a mandate for eLoran would also be a change in the FAA current GPS policy for GA. The current FAA GPS policy is that GPS WAAS is approved as a sole source solution for GA GPS navigation.

It is also important to note that in 2009 the Department of Homeland Security began dismantling the Loran system and infrastructure. Many of the towers required for eLoran transmissions have since been destroyed. Establishment of eLoran would require an entirely new infrastructure and development of new avionics standards. Sufficient lead time would be required to develop and implement a new eLoran system.

Thank you for the opportunity to comment on this important issue.

Sincerely,

A handwritten signature in black ink that reads "Melissa Rudinger". The signature is written in a cursive style with a large, sweeping initial "M".

Melissa Rudinger
Vice President
Government Affairs

The Aircraft Owners and Pilots Association (AOPA) is a not-for-profit individual membership organization of General Aviation Pilots and Aircraft Owners. AOPA's mission is to effectively serve the interests of its members and establish, maintain and articulate positions of leadership to promote the economy, safety, utility and popularity of flight in general aviation aircraft. Representing two thirds of all pilots in the United States, AOPA is the largest civil aviation organization the world.