



March 3, 2008

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 No. FAA-2007-29305

**ACI-NA Comments on:
Automatic Dependent Surveillance - Broadcast (ADS-B) Out
Performance Requirements to Support Air Traffic Control (ATC) Service**

The Airports Council International-North America (ACI-NA) represents 366 member airports who enplane more than 95 percent of the domestic and virtually all the international airline passenger and cargo traffic in North America. We appreciate the opportunity to comment on the ADS-B/Out NPRM.

ACI-NA agrees with FAA that additional capacity will be needed to meet future traffic demand. We have long advocated increasing the nation's airport capacity through construction of new runways and taxiways, wherever possible, and through the deployment of new technologies and procedures. ADS-B holds the promise of being an important element of the needed capacity expansion.

The NPRM provides an extensive discussion of the role of ADS-B in achieving NextGen goals. However, we are concerned that the NPRM does not adequately identify the specific benefits of equipage. As described in the NPRM, the primary benefits of ADS-B/Out appear to accrue to FAA in the form of reduced costs of Secondary Surveillance Radars. Significant benefits, such as potentially reduced separations, enhanced surface situational awareness for runway incursion prevention, self separation, etc., are referred

to only in very general terms and would require voluntary, additional equipage with ADS-B/In at some future date to achieve.

It is our understanding, which is supported by the NPRM, that the proposed ADS-B system will not satisfy the availability requirements for operation in the NAS at precisions needed to support key airport capacity enhancements without either additional satellites or other supplemental techniques to increase availability. The NPRM clearly states that:

“Presently, GPS augmented by the Wide Area Augmentation System (WAAS) is the only navigation position service that provides the level of accuracy and integrity (NIC, NACp, and NACv) to enable ADS-B Out to be used for NAS based surveillance operations with sufficient availability.”

It further states that:

“The FAA is considering whether other navigation position systems such as the Global Navigation Satellite System (GNSS) combined with tightly coupled inertial navigation systems are also capable of meeting the proposed performance standards.”

We are concerned, specifically, that the proposed ADS-B/Out system will not be able to support terminal operations, such as instrument approaches to runways separated by less than 4300 feet, unless the GPS signal availability is improved, either by the provision of additional satellites, the Local Area Augmentation System, ground based pseudolites or some other means. Airports need a surveillance system that will support independent instrument approaches to at least the 3000 foot runway spacing allowed by today’s Precision Runway Monitor (PRM). In order to make significant advances in improving airport capacity, independent instrument approaches to runways spaced as closely as 1000, or even 700, feet are also needed. The solution offered by the NPRM is for operators to equip with WAAS. However, there is no current requirement for such equipage and major air carriers are not planning on installing WAAS capability. FAA must identify a means of resolving this issue. No final rule should be promulgated unless the proposed system can be shown to satisfy the accuracy, integrity and availability needed to operate in the NAS.

At several locations the NPRM makes reference to use of ADS-B by vehicles operating on the airport surface, most specifically where it states:

“Additionally, the display may be used to determine the position of ground vehicles, e.g., snowplows, emergency vehicles, tugs, follow-me vehicles, and airport maintenance vehicles, if they meet ADS-B Out performance requirements. Surface vehicles operating on the movement area (runways and taxiways) would need to be ADS-B Out equipped.”

While we agree that inclusion of certain ground vehicles at appropriate high density airports would be highly advantageous, particularly as a runway incursion prevention tool, the NPRM’s treatment of this issue will not achieve the desired results. The NPRM is proposing amendment of various sections of Part 91 to require aircraft equipage. Since

airport vehicles are not regulated by part 91, a corresponding change to part 139 would be needed to mandate equipage of airport surface vehicles.

We wish to express a general concern that the ADS-B/Out performance requirements of this NPRM fail to identify any specific operational advantage. The vague references to benefits that will be realized at some future, unspecified time resulting from a future voluntary installation of ADS-B/In will not provide sufficient financial and operational justification to motivate aircraft operators to equip. There is a very real risk that the much needed capacity improvements cited in the NPRM will not be accomplished unless specific improvements in operational capabilities will result from this proposed rule. In our view, that will require the integrated treatment of both ADS-B/Out and ADS-B/In, along with identification of the associated revised air traffic procedures that will accomplish the needed capacity improvement. It is our view that adoption of this rule at this time is premature. Rather than proceed with an incomplete and hastily developed rulemaking proposal, we urge you to address the many comments filed in the docket and re-issue a supplemental notice of proposed rulemaking addressing these important concerns.

Finally, we believe that FAA should work with airports and airlines to provide direct financial benefits for the aviation industry to assist in accelerating equipage for the requirements of NextGen. .

Thank you for the opportunity to comment on this draft.

Respectfully submitted,



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