

## **ADS-B Update Discussion – January, 2016**

The SSA's response to the ANPRM is available on the SSA's website, so I will not reiterate it here, rather I will provide a brief update on the issues.

The proposed rule is now in the Rulemaking Process, so anyone involved in either reviewing and/or making recommendations on the ANPRM is prohibited by Law from discussing the topic directly. This situation is similar to what has happened with the 3<sup>rd</sup> Class Medical proposal.

The ANPRM was a direct result of Congressional involvement (NV – Reid & Amodei) requesting action and as noted publishing the ANPRM also prevents Congress from lobbying during the rulemaking process.

What is disappointing was that the ANPRM was 2 years in the making and we were never notified that it was ongoing, despite it being directed at us and having ongoing interactions with people involved in its development.

The FAA did provide the SSA an overview of the ANPRM/NPRM process after the ANPRM closed. They expect that the final report/recommendations will not be completed before the 2Q, 2017.

We know that some avionics manufacturers have complained that the aviation community is not equipping with ADS-B as quickly as expected; they have asked that the 2020 deadline be accelerated (Congressional hearing).

As noted in our response, we believe that the overall cost of installing this equipment is excessive. In response to the original ADS-B NPRM the SSA, EAA, AOPA, and others recommended against a firm deadline in the belief that the avionics manufacturers would not lower prices with a firm deadline in place. We recommended a price trigger for setting the deadline in the belief that imposing a regulatory requirement would artificially inflate prices.

The availability of TABS ADS-B equipment may provide some relief to the cost issue. However it remains to be seen how much lower costs will be, and installation costs and complexity continue to be an unknown. Currently, (as I write this) no TABS ADS-B out equipment is commercially available.

There have been consistent rumors that the UAV community is working on developing a low cost ADS-B out solution. If this is the case, TABS ADS-B out equipment could be commercially available for under \$500 by the 2020 deadline. Although underlying this is the potential risk that in order to safely accommodate UAVs in the NAS in the future, all aircraft might eventually require ADS-B out everywhere.

As far as the transponder part of the ANPRM, I am skeptical that the FAA will choose to require that gliders equip with transponders prior to the 2020 deadline for requiring ADS-B if for no other reason than the economic one. And that is assuming that the recommendation is that the glider exemption between 10k and 18k be deleted.

Two final comments.

I'll note that the ANPRM included no specific language, rather it only called for interested parties to provide additional information on these issues upon which the FAA may base its recommendations. Because of the lack of specific language and inability to discuss the ANPRM with the FAA over the course of the next 18 months, it is difficult to assess what the final recommendations will be.

Finally, I believe that there are entities within the Federal Government that consider sport aviation to pose a risk to the public and they want to restrict our activities as much as possible. The SSA will continue to work on your behalf to oppose unreasonable restrictions or limitations on our ability to access airspace.