



October 1, 2019

David E. Gray
Program Management Office
Surveillance and Broadcast Services
Federal Aviation Administration
600 Independence Avenue S.W.
Washington, DC 20591

RE: ADS-B Coverage to create a Minimum Operational Network for Alaska

Dear Mr. Gray:

On behalf of the many general aviation and business aviation companies, operators, and the hundreds of thousands of pilots our organizations represent, we are writing today to express our collective interest in creating a Minimum Operational Network for ADS-B coverage in Alaska. Our organizations have been involved in the development of ADS-B since the start of the Capstone Program which provided the operational demonstration of this technology for the nation. While the two areas used to prototype this technology are covered, and additional stations have been added for some portions of Alaska, we continue to experience large gaps in coverage in areas of the state that have significant air travel.

In support of Sect 321 of the FAA Reauthorization act requirement to conduct an evaluation, we have performed an analysis considering existing coverage, proposed T-Routes, recent flight tracks from Aireon ADS-B coverage of Alaska, and the 2005 MITRE analysis. An additional 23 approximate locations are identified that should be considered to fill major gaps in the routes used by GA aircraft (commercial and non-commercial) that use low-altitude routes across the state. Attached is a list of candidate locations and a graphic showing existing coverage at 3,000 ft above ground level and the proposed additional sites, without regard for terrain shadowing.

The locations identified are typically at airports, however we would like to see actual sites selected to optimize the coverage along these routes (identified by the circles depicted), as opposed to providing coverage just at the airport. The use of high sites or other existing

telecommunications infrastructure should be considered, to obtain the maximum coverage possible for these areas.

We look forward to working with FAA as you conduct the statewide evaluation of ADS-B coverage and to providing any additional comments to help develop as robust a network as possible. We are willing to work with your staff to refine this list, to keep costs to a minimum, and fill the major gaps to benefit both IFR and VFR operations across the state. Filling these gaps should also encourage more aviation businesses and aircraft owners who fly in Alaska to equip, as they will obtain the benefits in the areas they operate.

Sincerely,

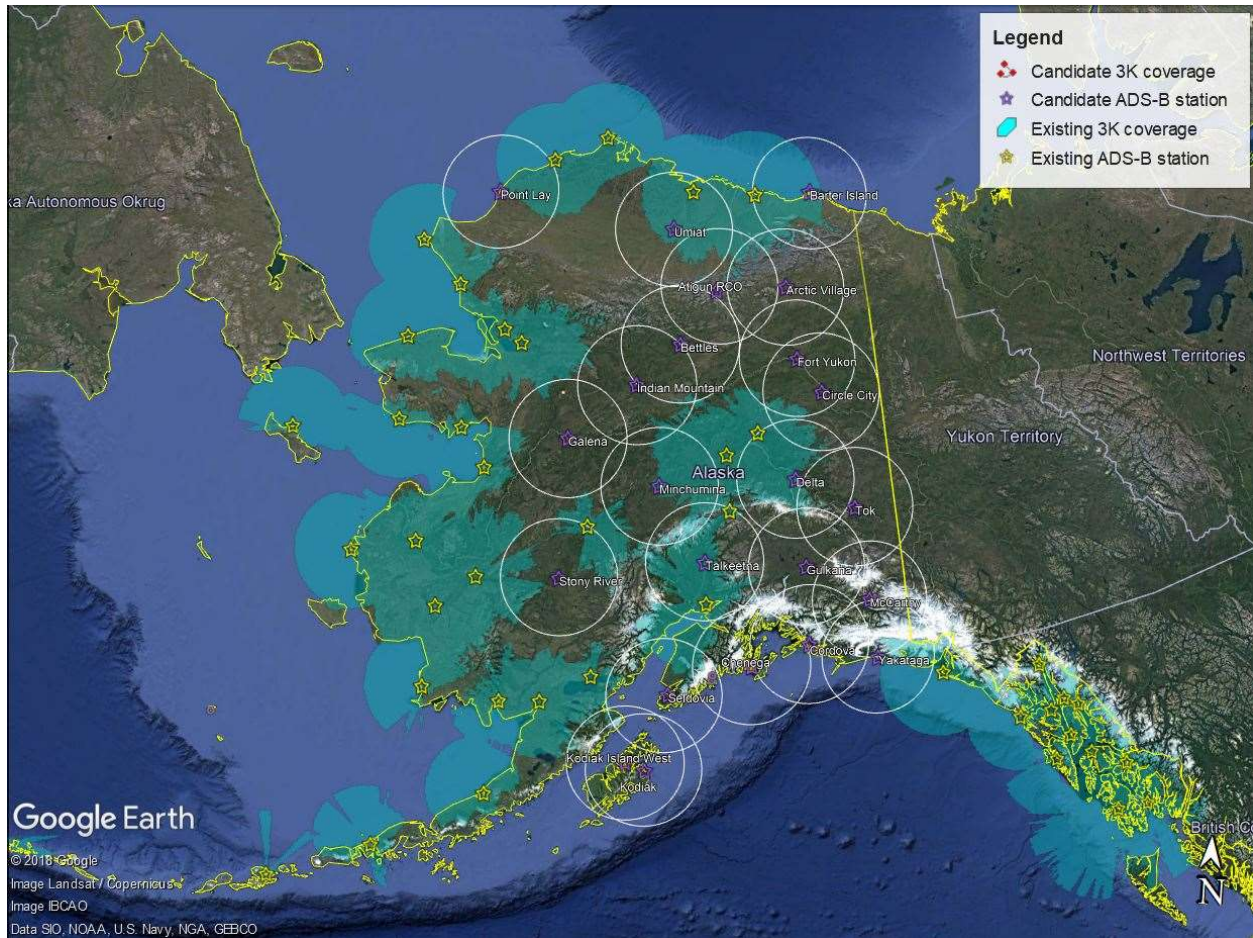
Aircraft Owners and Pilots Association
Alaska Airmen Association
Alaskan Aviation Safety Foundation
National Business Aviation Association

CC:

Senator Lisa Murkowski
Senator Dan Sullivan
Congressman Don Young
Mr. Kerry Long, FAA Alaska Regional Administrator

Attachment:

Proposed Alaska ADS-B MON Sites



Graphic of proposed ADS-B sites to create a Minimum Operational Network for Alaska

The sites listed below are referenced with respect to airports or general geographic locals (i.e. RCO site, etc.), however the intent is to provide optimum coverage in the general area, as opposed to locating the radio at an airport.

Arctic Village
 Atigun RCO
 Barter Island
 Bettles
 Chenega
 Circle City
 Cordova
 Delta
 Fort Yukon
 Galena
 Gulkana
 Indian Mountain

Kodiak Island East
 Kodiak Island West
 McCarthy
 Minchumina
 Point Lay
 Seldovia
 Stony River
 Talkeetna
 Tok
 Umiat
 Yakataga