

March 31, 2023

Timothy L. Arel
Chief Operating Officer
Air Traffic Organization
Federal Aviation Administration

David H. Boulter
Associate Administrator (Acting)
Aviation Safety Organization
Federal Aviation Administration

Dear Mr. Arel and Mr. Boulter,

The General Aviation Manufacturers Association (GAMA) and National Business Aviation Association (NBAA) request your attention to the need to resolve a long-standing question about acceptable performance of enroute data communications because of the impact the lack of clarity is causing for the aviation industry.

The FAA has struggled to establish acceptable performance of the air-to-ground communications link of airborne avionics for air transport as well as business and general aviation. Certificated airborne avionics has been called out as not meeting acceptable performance without a clear statement by the agency about acceptable performance standards.

The business and general aviation industry has faced specific uncertainties since October 2019 when the agency issued a NOTAM with a “request to stop” use of enroute data communications to general aviation operators. While the NOTAM was updated in favor of an unbounded trial program, the confusion escalated on October 25, 2022 when a determination was made to close participation in the trial program for new aircraft. The Program Management Organization (PMO) also requested time to resolve existing operational performance issues by year’s end following the determination.

GAMA and NBAA understand that the interagency collaboration has made progress since the start of the 2023 calendar year, but a resolution has not been achieved as of the Data Communications Implementation Team (DCIT) meeting hosted on March 29, 2023. We thank the AVS and ATO staff for the collaboration underway and their efforts. The lack of clarity, however, leaves our stakeholders in an untenable position where the safety of data communications has been placed into question by agency safety experts; work is underway to establish acceptable performance for the National Airspace System; no clear pathway to a resolution exists; and the business and general aviation operator community is left outside the use of data communications indefinitely.

We respectfully request your attention to the lack of clarity about acceptable performance of enroute data communication and that the FAA no later than April 30, 2023, identifies acceptable performance for data communications for all operations – business, general aviation, and air transport – as well as establish a schedule for the publication of official guidance documents for operations.

Respectfully,

Jens C. Hennig
Vice President – Operations, Safety & Security
GAMA

Heidi J. Williams
Sr. Director, Air Traffic Services & Infrastructure
NBAA

CC: AVS Flight Standards Services
AVS Aircraft Certification Organization
ATO Program Management Organization