



**Airlines for America**<sup>®</sup>  
We Connect the World



July 28, 2021

The Honorable Stephen M. Dickson  
Administrator  
Federal Aviation Administration  
800 Independence Avenue, S.W.  
Room 1010  
Washington, D.C. 20591

Dear Administrator Dickson,

Thank you for your leadership during these challenging times. We appreciate your efforts to fully engage all stakeholders in the recovery and your continued partnership in the modernization of U.S.-controlled airspace to enhance safety and efficiency.

It has now been 18 months since the January 2020 mandate for Automated Dependent Surveillance-Broadcast (ADS-B) Out was implemented. In addition, space-based ADS-B is now being used by Air Navigation Service Providers (ANSPs) that control nearly 50 percent of the world's oceanic airspace.

In April 2019, we wrote to the FAA (letter attached) providing our views on the substantial benefits of oceanic use of space-based ADS-B surveillance. Given our airlines have invested more than \$1 billion in ADS-B avionics and the benefits we now see from other ANSPs, we again voice our strong support for space-based ADS-B.

We were recently given an update by the FAA on the agency's actions as it relates to space-based ADS-B. We commend your team for recognizing that this real-time data is not only useful for air traffic operations but also has immense safety value. One example is with search and rescue operations around the world including the vast oceanic environment whereby seven lives have been saved because of immediately available information obtainable from space-based ADS-B. We also believe there may be more life-saving applications with real-time tracking enabled by space-based ADS-B..

We are concerned to hear, however, that the FAA may delay oceanic ATC operations of space-based ADS-B from 2022 to potentially 2028 or 2029. Such a delay ignores the investment made by aircraft operators who have installed ADS-B avionics as well as the safety, operational and environmental benefits that are being realized in airspace using space-based ADS-B. Our members who have been flying through Canadian and UK controlled oceanic airspace have been getting the value of this capability since March of 2019 including:

- Improving safety through real-time feedback to pilots when they are flying at uncleared altitudes;
- Allowing aircraft to fly more optimal routes in the North Atlantic reducing meaningful fuel costs;
- Reducing carbon emission through these improved flight paths.

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From an air traffic controller's perspective, space-based ADS-B has already allowed controllers to utilize reduced separation standards in other oceanic environments, greatly improving the efficiency of operations.

Given the importance of international aviation traffic to the health of the U.S. economy, we urge your leadership on ensuring that all necessary steps to implement space-based ADS-B surveillance in the U.S. oceanic airspace is done as close to the original 2022 start date as possible.

Thank you for considering our views and we look forward to working with you to modernize our skies and help ensure U.S. global leadership in air traffic and safety issues.

Sincerely,



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Captain Joe DePete  
President  
Air Line Pilots Association



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Stephen A. Alterman  
President  
Cargo Airline Association



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Nicholas E. Calio  
President and CEO  
Airlines for America Association



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Paul M. Rinaldi  
President  
National Air Traffic Controllers Association,  
AFL-CIO



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Sara Nelson  
International President  
Association of Flight Attendants-CWA, AFL-CIO