

# EAA CANADIAN COUNCIL

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Ms Lynn Ducette  
Acting Chief, Regulatory Affairs  
Civil Aviation, Safety and Security Group, Transport Canada  
Place De Ville, Tower C  
330 Sparks Street  
Ottawa, Ontario, K1A 0N5  
Canada

October 21, 2008

Dear Ms Doucette,

Re: Aircraft Emergency Beacons  
406 MHZ Technology

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The writer is the Chairman of Canadian Council of the Experimental Aircraft Association. Our organization has approximately 5100 members in Canada. Our Members are concerned about the manner in which the new 406 MHZ technology (involving COSPAS-SARSAT Satellites) is being implemented and how this may affect the owners and operators of private aircraft within Canada.

We believe that further consideration should be given to alternate methods of utilizing the new satellite technology for search and rescue purposes. At this point in time the manufacturers are rushing products to market but I am aware of only two products that meet the present Canadian specifications and that can actually be purchased at this time.

Owners of aircraft may face a considerable backlog in obtaining suitable equipment or in having that equipment installed in a aircraft in order to meet the present apparent deadline of February 1 2009. Owners may also face a considerable expense to meet the present requirements as we understand them.

The utilization of portable beacons or personal locator beacons (PLB'S) should be considered as a possible means of utilizing the new technology. These units could provide an alternate means of compliance in the short or long term. Several models of PLB are now available for purchase and some have features not available on the fixed installations now being mandated.

We believe that the exception that has permitted aircraft maintenance personel to install beacons appears to be a good policy, however we understand that the exception ended in September 2008. It would seem appropriate that the exception be extended or perhaps be made permanent.

A two year compliance window has been discussed and would seem an appropriate way to allow new products to become available, to be properly assessed and for meaningful discussions of alternative methods of compliance to be considered.

The writer has flown long enough to recall the original Canadian standards issued for 121.5 MHZ ELTS and the expense and hardships caused when those standards were not workable or practicable.

Please do not hesitate to contact the writer should you wish to discuss this issue in more detail. Our members would like to feel that all alternatives have been properly canvassed before these measures become mandatory.

Yours Very Truly

A handwritten signature in dark ink, appearing to read 'G. Denis Browne', with a stylized flourish at the end.

G Denis Browne  
Chairman EAA Canadian Council