

The requirements for 207 minutes ETOPS specify Satcom Voice and Data. Commentator submits that there are other ways to achieve global communications, such as High Frequency Radio Data Link (HF DL) and that provided global datalink is available, global voice communication is not necessary.

Commentator suggests that all references to Satcom Voice and Data are changed to "Global Datalink" of "Global Communications" which are not dependant on VHF Line-of-Sight communications, but not limited to Satcom.