



WHS 01-09

***General Aviation  
Manufacturers Association***

1400 K Street NW, Suite 801  
Washington, DC 20005-2485  
(202) 393-1500 • Fax (202) 842-

February 22, 2001

Docket Management System (DMS)  
U.S. Department of Transportation  
Plaza Level 401  
400 Seventh Street, SW.  
Washington, DC 20590-0001

**Subject:       Docket Number FAA-2000-8490; GAMA Comments on NPRM 00-16,  
                  Reduced Vertical Separation Minimum**

The General Aviation Manufacturers Association (GAMA) is a national trade association representing over 50 American manufacturers of fixed-wing aircraft, engines, avionics, and components. In addition, GAMA member companies also operate aircraft fleets, airport fixed-based operations, pilot and maintenance technician training facilities across the nation. GAMA submits the following comments in response to FAA's Notice of Proposed Rulemaking (NPRM 00-16) *Reduced Vertical Separation Minimum (RVSM)*, published in the Federal Register (65FR79284) on December 18, 2000.

GAMA member companies support the planned implementation of RVSM where airspace is congested. However, there is some concern that the proposed rule to implement RVSM in WATRS on November 1, 2001 would not allow enough time for the fleet to be properly equipped.

Considering the January 24, 2002 implementation date for RVSM in European airspace, many operators are scheduling the necessary modifications and ordering the appropriate equipment. It is our understanding that avionics manufacturers have been planning the necessary production capacity to adequately support equipage of aircraft that operate in European Airspace.

However, the proposed implementation date for the WATRS airspace may not provide enough time for manufacturers to change production capacity. We are concerned that this may delay the ability of operators to properly equip for RVSM in WATRS airspace.

GAMA strongly recommends that implementation of RVSM in WATRS airspace be postponed by 6 to 12 months to insure that there is enough time for the fleet to be properly equipped. The implementation date should consider the size of the fleet that must be modified for RVSM operations in Europe,



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WATRS, and any other proposed airspace as well as the ability of manufacturers to provide the necessary equipment and facilities to install the modifications.

GAMA appreciates the opportunity to review the proposed rule. Please feel free to contact me at [wdesrosier@generalaviation.org](mailto:wdesrosier@generalaviation.org) or (202) 393-1500 or if there are any questions or comments.

Sincerely,

*/s/ Ron Swanda*

Ronald L. Swanda  
Vice President, Operations