

FAA-2000-10910

Response to NPRM FAA-01-10910-1
Collision Avoidance Systems

Collision Avoidance Equipment is important for cargo aircraft, but it is costly. TAS systems (TSO-C147) are less expensive, and Class A systems are required to meet the same Minimum Operational Performance Standard (MOPS) required for TCAS I in all material respects.

I suggest the NPRM should include TAS Class A as an equivalent alternative to TCAS I for the aircraft proposed to require TCAS I.

Ref: TSO-C-147 for TAS references DO-197A (the MOPS for TCAS I), as does TSO-C118 for TCAS I. See <http://www.faa.gov/avr/air/AIR100/tsocur/Current.htm>

Is it the intention of the rule to require Mode S transponders for those aircraft requiring TCAS I that use Mode A/C transponders? On page 30, under Proposed Requirements for TCAS I, or Equivalent, it does not seem so. Yet under proposed 121.356 on page 67, there is a requirement for a Mode S transponder.

The estimated cost of equipage for TCAS I is surprisingly small. It apparently left out the cost of the elements themselves. If a Mode S transponder were required then the costs would be still higher.

I suggest removing the Mode S requirement for TCAS I installations.

I suggest reviewing the costs associated with TCAS I equipage.

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