



January 13, 2022

Mr. Stephen Dickson
Administrator
Federal Aviation Administration
800 Independence Avenue
Washington, DC 20591
Via E-Mail

Ms. Jessica Rosenworcel
Chairwoman
Federal Communications Commission
45 L Street NE
Washington, DC 20554
Via E-Mail

Dear Administrator Dickson and Chairwoman Rosenworcel:

Airports Council International-North America (ACI-NA) represents local, regional and state governing bodies that own and operate commercial airports in the United States and Canada. ACI-NA's members enplane more than 95 percent of the domestic and virtually all the international airline passenger and cargo traffic in North America.

Our member airports remain very concerned about the process and outcome of your agencies' actions to mitigate unsafe interference of C-Band 5G transmissions on radar altimeters.

As a result of the Notices to Air Missions (NOTAMs) the Federal Aviation Administration (FAA) issued last night, more than 100 airports and heliports within 46 of the largest metropolitan areas of the country will have their low visibility approach procedures closed due to potential radio frequency interference between 5G transmissions and radar altimeters. The airports affected include many of the largest and busiest commercial service airports in the United States, including airports in Boston, New York, Orlando, Dallas Fort Worth, Seattle, San Francisco, and Los Angeles just to name a few. More alarmingly, multiple Level I and II trauma hospitals will also see their low visibility approach procedures shuttered.

Potential interference of new 5G services with well-established radar altimeter frequencies have been known for years. Ample time was available to develop reasonable near and long-term solutions that would avoid impacts to travelers, air cargo shippers, and communities that depend on reliable air transportation services.

We are running out of time to find reasonable solutions to avoid an unprecedented loss of low visibility approach capability beginning January 19, 2022, in 46 out of the 50 largest metropolitan areas of the country. This approach capability is essential to the safety, predictability, efficiency, and reliability of air travel in the United States. This capability has been developed over decades and has entailed hundreds of millions of dollars of investment from airports, airlines, states and the Federal government. The U.S. air transportation system is the safest in the world because of this level of collaboration around our shared safety mission.

Despite promises from an eleventh-hour "deal" made between the FAA and telecommunications companies, we still find ourselves facing the loss of this capability at hundreds of U.S. airports without any clear indication when it will be restored.

As such, ACI-NA is calling on the FAA and the FCC to work with telecommunications companies and all aviation stakeholders to take the time necessary to expand 5G access without disrupting air travel for passengers, businesses and local communities across the United States.

We urge you to work with your respective industry stakeholders to delay 5G implementation until sufficient approvals of Alternative Methods of Compliance (AMOCs) are in place that enable the commercial aircraft to continue the safe use of the low visibility approach procedures the FAA is now closing by these NOTAMs.

We are also urging both agencies to work diligently with stakeholders to ensure we do not find ourselves in the same situation as C-band 5G networks are expanded in other markets in coming months.

The expansion of 5G services in the United States should be coordinated responsibly and not at the expense of the traveling public, countless individuals and businesses that depend on air cargo, and local communities. With months to plan for this expansion, we remain mystified why Federal regulators and the telecommunications companies could not take the necessary steps to avoid potential widespread disruptions in air travel.

Our member airports will continue do their best to manage and mitigate the air travel disruptions that we expect to occur with the unprecedented loss of low visibility approach capability on January 19. However, we expect that the FAA, FCC, and telecommunications companies will work to further modify their plans for 5G implementation in ways that avoid disrupting America's air transportation system.

Sincerely,

A handwritten signature in cursive script that reads "Kevin M. Burke".

Kevin M. Burke
President and CEO
Airports Council International – North America