

February 10th, 2026

Docket Operations, M-30;  
U.S. Department of Transportation (DOT),  
1200 New Jersey Avenue SE,  
Room W12-140, West Building Ground Floor,  
Washington, DC 20590-0001



## **RE: NORMALIZING UNMANNED AIRCRAFT SYSTEMS BEYOND VISUAL LINE OF SIGHT OPERATIONS; REOPENING OF COMMENT PERIOD**

The Alaska Airmen's Association is a non-profit General Aviation (GA) organization representing over 2,000 members. For 75 years, our mission has been to "Promote, Protect, and Preserve General Aviation in Alaska." Our membership includes pilots, mechanics, aircraft owners, and other aviation enthusiasts. On behalf of our members, please accept the following written comments regarding the seven questions in the reopened comment period on normalizing beyond-visual-line-of-sight operations for unmanned aircraft systems.

It is important to establish a baseline definition of electronic conspicuity (EC) in this context. When GA uses the term EC, we do not mean a rule-compliant ADS-B out solution that would allow us to enter rule-mandated airspace. From our perspective, an EC device is a short-range, peer-to-peer traffic deconfliction tool, not an Air Traffic Control (ATC) surveillance tool.

*1. Are there alternate EC devices capable of complying with proposed § 108.195(a)(2)(ii) that are available today? What are the names and manufacturers of those devices? Where are the devices currently approved for use and for what purpose(s)? Do any of them have the capability to inform the user that the device is not working properly?*

The only device we are aware of that might meet 108.195(a)(2)(ii) is the SkyEcho from uAvionix. It is our understanding that this device is approved for use in the United Kingdom, Australia, and New Zealand. The FAA needs to clarify what "not working properly" means, as there are many ways a device can fail. Our understanding is that the SkyEcho uses lights to indicate its operational status.

*2. Are these EC devices approved for the same purpose as ADS-B Out? Do these alternate EC devices provide other benefits beyond what ADS-B Out offers? Are existing alternate EC devices used for, or capable of providing, anonymity?*

As noted above, EC devices are not equivalent to an ADS-B out rule-compliance solution. EC devices offer a low-cost option for those who do not want or need a full ADS-B out rule-mandated compliance system. A 978 MHz EC device could also provide anonymity, a major concern for GA operators in Alaska.

*3. If not currently available, how quickly can alternate EC devices be available to the U.S. market once an approved standard is available?*

This question is best answered by the manufacturers of such devices, but in conversations with uAvionix, they indicated they could supply the U.S. market within six months of approval.

*4. Would the performance requirements of § 91.227 applicable to ADS-B Out also be appropriate for alternate EC devices? Why or why not?*

91.227 applies to ADS-B solutions that allow ATC surveillance and entry into rule-mandated airspace, not to short-range, peer-to-peer traffic deconfliction or to establish right-of-way. Some 91.227 performance

requirements may be beneficial for EC devices, but, as stated above, GA does not consider EC a device for entry into rule-mandated airspace.

*5. RTCA has a standard for electronic conspicuity (RTCA DO-282C). Are there any reasons why applying this standard for alternate EC devices in the U.S. not be feasible or appropriate? Are there other existing industry consensus standards for EC that the FAA should consider accepting?*

The Alaska Airmen's Association suggests that the FAA look to other countries (the UK, Australia, and New Zealand) and their certification and consensus standards processes for approving EC devices in the United States.

*6. What would be the potential downside(s) of requiring EC devices to include some sort of indicator ( e.g, visual or audio) to notify the pilot that the device is not working properly?*

The Alaska Airmen's Association believes it is important to have a basic indication of an EC device's functionality and health, but more information is needed to define "not working properly." The FAA should consider that increased complexity is directly correlated with cost, and that cost directly affects users' equipment levels.

*7. Are there other methods or technologies that the FAA should consider allowing manned operators to use to be electronically detectable besides ADS-B Out or alternate EC devices?*

As noted in our first round of comments, the Alaska Airmen's Association strongly believes it is reckless and foolhardy to rely entirely on a GPS-based deconfliction system, especially given the military's numerous GPS interference exercises in Alaska, which we anticipate will increase in the coming years. We also find it irresponsible and inappropriate to place the entire burden of deconfliction on manned aircraft, as we noted in our previous comments. Historically, any newcomer to aviation has had to integrate into the current system. This proposal turns more than 100 years of safety on its head; the unmanned sector of aviation should be equally responsible for traffic deconfliction. To turn the question around, what systems should unmanned aircraft have beyond a GPS-based system to deconflict with manned aircraft? A few possible solutions include optical, acoustic, or thermal sensors.

Thank you for opening another comment period to provide clearer information. The unmanned sector of aviation has a lot to offer, but it should not be granted special status when it comes to right-of-way or any other operational rules and standards. The rules we have in place today were written in the blood of those who died.

Sincerely,



Adam White  
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Alaska Airmen's Association