



Briefing Note – 406 MHz Emergency Locator Transmitters (ELT)

Transport Canada is in the process of amending the regulation that requires ELTs to be installed on most aircraft. This change is required because the international satellite system that monitors these devices is being decommissioned on 1 February 2009. A new monitoring system, based on 406 MHz, is in place but in order to take advantage of this system, a new ELT is required.

The cost to Canadians for this transition is not justified. ELTs fail to perform in the majority of accidents because antennas break off, the device becomes submerged in water or the wreckage masks the antenna. The new ELTs retain these problems and so the prospects of being found are not significantly improved with the move to the much more expensive 406 MHz ELTs. Our estimate of the cost to equip the fleet in Canada is between \$80 million and \$120 million whereas the government potentially will save tens of millions of dollars from reduced false alerts. If the government insists on 406 ELTs, the government should subsidize the purchase of these devices. There is no indication that the government intends to do so.

Alternative technologies that are much more affordable and provide capabilities that in some cases are better than ELTs are available but the revised regulation does not permit them. Furthermore, the General Aviation sector is being held to a higher standard than the airlines because the revised regulation permits alternatives that are less accurate than 406 ELTs and yet are not available for our sector of aviation. An example is a Type A Operational Control System, which is only available for major airlines. Airliners can go several hundred miles between reports but the accuracy of devices that smaller aircraft will have to install is 2.7 miles.

The Canadian Aviation Regulations Advisory Council (CARAC - involving government and industry) achieved consensus in November 2007 and drafted a regulation that provided cost-effective alternatives. However, the Department of National Defence, who chose not to attend the meeting, submitted a letter of dissent. The internal review committee at Transport Canada (CARC) unilaterally accepted this dissent and made significant changes to the draft that was achieved by consensus and effectively mandated 406 ELTs. This is a fundamental failure of the CARAC process.

Finally, the US will not be mandating 406 ELTs. This lack of harmonization will prohibit tens of thousands of aircraft from entering Canada, including those transiting to and from Alaska. This will be a major international issue for the Canadian government if this revised regulation proceeds as drafted.

The draft regulation is currently in legal vetting, leading to Gazette I in the near future. It should be stopped and redirected back to CARAC for further discussion. A letter of dissent with complete explanation of the issues is attached.

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